



volution

Modern Slavery and Human Trafficking Policy

Volution Group plc

Modern Slavery and Human Trafficking Statement



1. About Volution Group

This is Volution Group's statement on anti-slavery and human trafficking in accordance with the UK Modern Slavery Act 2015 and constitutes our statement for the financial year ended 31 July 2025. Volution Group plc which is listed on the London Stock Exchange (LSE: FAN) and is the parent company of the Volution Group of companies. The Group is a leading international designer and manufacturer of energy efficient indoor air quality solutions.

Volution Group comprises 29 key brands across three regions:

- UK: Vent-Axia, Manrose, Diffusion, National Ventilation, Airtech, Breathing Buildings, Torin-Sifan.
- Continental Europe: Fresh, PAX, VoltAir, Kair, Air Connection, Rtek, inVENTer, Ventilair, ClimaRad, ERI Corporation, VMI, I-Vent.
- Australasia: Simx, Ventair, Manrose, DVS, Fantech, Ideal Air, NCS Acoustics, Air Design, Major Air, Systemaire, Burra Steel.

2. Policies and governance

Volution Group works hard to ensure that slavery and human trafficking is not taking place within our employed workforce, or any of our supply chain. We believe that our exposure to the risks of modern slavery is relatively low, however, we are not complacent. We understand that, if we are to be successful in delivering our strategy for growth, then we must make sure that we interact with our employees, customers, suppliers, and others properly.

That is why we maintain and review several key policies to uphold human rights, including:

- Supplier Code of Conduct – this requires suppliers to adhere to ethical labour practices.
- Whistleblowing Policy – this enables workers to report concerns confidentially.
- Ethical Sourcing Policy – this guides our responsible purchasing decisions.
- Employee Code of Conduct – this sets out our commitment, within Volution Group and externally, to the value and importance that we place on honest, ethical, and lawful conduct in all our business dealings.

3. Supply chains

Volution Group globally has a substantial and wide-reaching supply chain with a significant number of suppliers across 42 countries. Consistent with the principles set out in our Code of Conduct, we prohibit forced labour, child labour, and discrimination within our supply chain. We ensure, as far as is reasonably practicable, that our suppliers have controls in place to uphold our commitment to combatting slavery and human trafficking.

4. Risk assessment and supplier audits

We recognise that the risk of Modern Slavery is present in every country in the world, and therefore we have put in place robust measures to counter this risk. It is also the case that some geographical locations and industries have a higher risk of Modern Slavery malpractice, and due to this we have chosen to take a risk-based approach in our efforts to eliminate malpractice from our supply chains.

Our risk assessment is based on the Global Slavery Index. If a country has a prevalence score of >10.0, a vulnerability score of >35 or a government response score of <40 it is deemed to have a moderate to high modern slavery risk and we conduct physical audits for suppliers in these countries. A review of modern slavery geographical risk will be conducted annually to ensure that any new risks are identified and acted upon swiftly.

A number of physical supplier audits were carried out in the financial year ending 31 July 2025. Further physical audits are due to be conducted in the remainder of 2025 and in 2026.

5. Monitoring and continuous improvement

We take appropriate steps to endeavour to ensure that there is no modern slavery or human trafficking in our supply chains, including:

- requiring new suppliers to declare as part of our supplier approval processes, that they are not involved in modern slavery or human trafficking, including confirmation of their understanding and commitment to the principles of the UK Modern Slavery Act and which are included within our Supplier Code of Conduct;

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- requiring our current incumbent supply base to also declare their commitment and compliance to the principles set out in our Supplier Code of Conduct;
- conducting both desktop and physical audits at the production centres for suppliers based in higher risk geographical areas, or if there is reason to believe that and audit may be required for any supplier. Geographical risk is assessed using the Global Slavery Index;
- requiring suppliers with whom we have a spend greater than £100,000, of which there were 181 in the financial year ended 31 July 2025, to have an additional level of scrutiny. The suppliers within scope should either have a publicly available statement on their approach to tackling Modern Slavery, or provide information on what they are doing, or planning to do, to combat Modern Slavery; and
- requiring service providers who work on our sites, or do any work on our behalf, to provide details on how they ensure that none of their employees could be victims of Modern Slavery. The scope of this requirement includes cleaning companies and temporary labour providers. There were 70 service providers in scope for this requirement in the financial year ended 31 July 2025.

6. Incident response protocol

If any supplier is deemed to be in breach of our Supplier Code of Conduct, they will be required to complete a Corrective Action Plan. Continued non-compliance will result in the supplier being removed from our approved supplier list.

There were no suppliers found to be in breach of our Modern Slavery standards in the financial year ended 31 July 2025. As with the previous year, we have severed ties with another supplier based in the Far East that did not engage.

7. Plans for Financial Year ending 31 July 2026

In the financial year ending 31 July 2026, we will be working closely with the 30 suppliers with whom we spend £1m+. The main focus areas of this exercise will be on:

- Risk Assessments - information on any recent risk assessments conducted, and the findings;
- Training – details on how training is provided to their own employees and suppliers regarding modern slavery and human trafficking;
- Supplier Audits and Assessments - how often they audit their suppliers for compliance with anti-slavery policies, including summaries of recent audit findings and any corrective actions taken; and
- Supplier Code of Conduct - how compliance with our Supplier Code of Conduct is enforced and monitored.

These 30 suppliers represent 43% of our 3rd party direct spend.

8. Employees

To ensure our employees are not subject to undue influence and are treated with dignity and respect, Volution Group has robust human resource policies and procedures in place across all its operations. Volution Group is committed to ensuring that all staff receive fair remuneration for the job they perform and undertakes regular reviews of terms and conditions across the workplace. Volution Group adheres to the payment of the National Living Wage in the UK and all compulsory minimum wage premiums as set by governments.

Volution Group also has robust recruitment processes, which include verifying the identity of each employee and their right to work in each country before commencing employment. All temporary workers are supplied through reputable recruitment agencies, which have been subject to thorough due diligence of their practices.

The annual employee engagement survey provides a vital opportunity for employees to share their experiences, highlight potential risks and suggest improvements to workplace conditions. We encourage all staff to participate and provide honest feedback, helping us strengthen our due diligence processes and foster a culture of accountability.

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9. Speak Up Facility

Employees can report concerns at any time through our confidential grievance channels, which are regularly monitored to ensure prompt and effective action.

Volution Group's Speak Up facility is designed to make it easy for employees to make disclosures, without fear of retaliation.

10. Training

Personnel at Volution who have a supplier-facing role are required to complete a Modern Slavery awareness training module and demonstrate that they have understood the dangers that modern slavery poses to the business, and the devastating impact it has on its victims.

The level of completion of our Group-wide training modules is a KPI against which we track our performance and is reported to the Board twice a year.

11. Stakeholder engagement

Volution Group actively engages with stakeholders and industry initiatives to strengthen our approach to modern slavery prevention.

As part of our commitment to continuous improvement, we have participated in the **UN Global Compact UK's Modern Slavery Act Statement Peer Review Programme** to benchmark our reporting against industry best practices and gain valuable insights from peer organisations. This engagement allows us to refine our disclosures, enhance transparency, and align with evolving expectations in ethical business conduct.

Additionally, we have engaged with CCLA and LGPS following the CCLA's Modern Slavery UK Benchmark, using their findings to assess our performance and identify areas for improvement.

By collaborating with these leading initiatives, we ensure our approach remains robust, informed, and aligned with global standards.

This statement has been approved by the Volution Group plc Board of Directors on behalf of Volution Group. A new statement will be published each year on the corporate website www.volutiongroupplc.com.

Ronnie George
Chief Executive Officer
Volution Group plc

Approved: 7 October 2025