Modern Slavery and Human Trafficking Statement
For the Financial Year Ended 31 January 2026

Introduction

This Modern Slavery and Human Trafficking Statement is made in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by The P & M Group during the financial year ended 31 January 2026, to prevent modern slavery and human trafficking within our business operations and supply chains.

The P & M Group takes modern slavery, forced labour, bonded labour, child labour, and human trafficking in any form extremely seriously, and we are committed to preventing such practices.

We are dedicated to acting ethically, with integrity, and in compliance with all applicable laws and regulations. We expect the same high standards from our employees, contractors, suppliers, and business partners, and we work to ensure that human rights are respected and protected throughout our operations.

Our Business

The P & M Group brings together specialist businesses that are shaping the future of industrial construction and the cold chain. ISD Solutions leads the way in the design, installation, service and maintenance of insulated structures, and ISD Solutions Australia extends this expertise internationally. PLG Insulations adds further strength through specialist thermal pipe insulation capability.

S Tysoe Installations provides expert labour, installation and ongoing maintenance support across complex projects.

The Companies are located in the United Kingdom and Australia. We employ approximately 200 employees and work with suppliers, contractors, and business partners to support our operations.

Our Supply Chains

Our supply chains include suppliers and service providers involved in:

- Labour & Plant services
- Materials
- Professional and business services
- Information technology and telecommunications
- Facilities management and maintenance
- Recruitment and temporary labour services

We recognise that risks of modern slavery may arise in both domestic and international supply chains and will always endeavour to reduce and address these.

Policies and Commitments
We maintain policies and procedures designed to promote ethical business practices and protect against modern slavery. These include:

- Anti-Bribery Policy
- Whistleblowing Policy
- Diversity & Inclusion Policy
- Code of Conduct Policy
- Anti-Slavery & Human Trafficking Policy

These policies communicate our expectations regarding lawful and ethical conduct and support compliance throughout our Company and supply chains.

The Company does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports slavery, servitude and forced or compulsory labour.

Due Diligence
We expect all those in our supply chain to comply with our values.

To help identify and mitigate the risk of modern slavery, the Company has taken the following steps to ensure that modern slavery or human trafficking is not taking place:

- We limit, where possible, the geographical scope of our operations to the UK, Ireland, Europe and Australia. Where possible, we build long-standing relationships with local suppliers and make clear our expectations of business behaviour.
- We expect these parties to have suitable anti-slavery and human trafficking policies and processes.
- We mainly work with UK & Ireland-based subcontractors in the UK and Australian-based subcontractors in Australia. We ensure suitable and appropriate contract and payment terms.
- We assess prospective suppliers before engagement.
- We use our internal expertise to support ethical business practices and the use of third-party suppliers and partners in procurement and contract processes.

- We have systems in place to encourage the reporting of concerns using our Whistleblowing Policy.
- As required, we investigate allegations or reports of unethical practices.

Where material concerns arise, we will implement corrective actions accordingly.

Risk Assessment and Management
We assess the risk of modern slavery within our operations and supply chains. Areas considered include:

- The nature of services or products provided.
- Use of temporary, agency, or migrant labour.
- Geographic regions associated with elevated labour exploitation risks.
- Supplier compliance history and reputation.

Based on our assessment, we implement proportionate measures to manage identified risks.

Training and Awareness
We seek to ensure that employees understand the risks associated with modern slavery and know how to identify and report concerns. We have ensured that all employees have received a copy of our Anti-Slavery and Human Trafficking Policy. We have also developed relevant training for roll-out in the coming financial year.

Our management team promotes a culture of ethical conduct and accountability throughout the organisation.

Reporting Concerns
Employees, suppliers, contractors, and other stakeholders are encouraged to raise concerns regarding suspected modern slavery, human trafficking, or other unethical practices through our whistleblowing procedures or directly with management.

Reports are treated seriously and investigated appropriately.

Measuring Effectiveness
We monitor the effectiveness of our approach through measures such as:

- Ensuring the leadership and management in our business are aware of their responsibilities in addressing modern slavery risks.
- Completing pre-employment checks on our employees, including right to work checks in line with our Pre-Employment Checks Policy.
- Ensuring compliance with our Non-English Speakers Policy and our Safeguarding Policy.
- Ensuring minimum age requirements are adhered to in line with relevant legislation.
- Always applying the national minimum wage thresholds in line with relevant legislation.
- Carrying out pre-appointment checks of all our sub-contractors.
- Maintaining regular contact with our third-party suppliers and partners.

We remain committed to continuously improving our approach to preventing modern slavery. Over the coming 12 months, we aim to:

- Roll-out e-Learning Training, which has been developed to work hand-in-hand with this Statement and the Company's Anti-Slavery and Human Trafficking Policy.
- Increase our controls to ensure our third-party suppliers and partners are aware of their responsibilities in addressing modern slavery risks.
- Carry out continual review of supplier performance and address concerns where identified.

Approval
This statement has been approved by the Board of Directors of The P&M Group Limited and will be reviewed annually.

Signed on behalf of The P & M Group Limited

Name: Jane Gwatkin
Position: Director and Company Secretary
Date: 23 July 2026