



MODERN SLAVERY TRANSPARENCY STATEMENT 2025

INTRODUCTION

This is the Modern Slavery Transparency Statement of EM Topco Limited and all other relevant group companies ("Element" or the "Group") for the financial year ended 31 December 2025. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act").¹

The Act creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). Element is committed to combating all forms of Modern Slavery.

ABOUT ELEMENT AND SUPPLY CHAINS

Element is one of the world's leading providers of laboratory-based testing services. Our purpose is "To Make Tomorrow Safer than Today" and we do this by supporting 50,000+ customers operating in some of the world's most technical and highly regulated industries where failure in use of their products, materials and technologies is not an option.

Originally formed from the in-house materials testing and product testing laboratories of the Netherlands-based Stork Engineering Group, Element can trace its testing pedigree back to 1827. Element was formed in 2010, following a management buyout from Stork Engineering Group.

Through a combination of acquisitions and organic growth, over the past five years Element has doubled its revenues and significantly extended its technical capabilities and operational capacity. Today, our team of approximately 8,300 scientists, engineers, and technologists, work across a global network of over 270 laboratories located in 25+ countries, and support customers from early R&D, through complex regulatory approvals, and into production ensuring their products are safe, sustainable and fit for purpose. The Group specializes in providing a comprehensive range of materials testing, product qualification testing, inspection, consultancy and certification services.

Headquartered in London, UK, Element operates 6 business units within two regions (the Americas and Europe, Middle East, Asia & Africa (EMEA)) - serving a wide range of advanced industrial end markets including in the Aerospace, Space and Defence; Built Environment; Connected Technology and Mobility; Life Sciences; Energy and Transportation & Industrials sectors. Most of our services are carried out in Element's laboratories, however some inspections and audits are also performed at clients' sites.

Element is committed to conducting its business in a socially responsible manner and maintaining the highest ethical standards in all our business activities, always respecting the needs of our customers, employees, investors and other stakeholders. Many of our customers and other stakeholders carry out Modern Slavery and other social and governance due diligence on their own supply chains. We respond to their requests for information in relation to the steps we take to mitigate the risks of Modern Slavery in our own business and supply chain. The Group's reputation, together with the trust and confidence of those stakeholders, is one of its most valuable assets, and Element strives to maintain the highest ethical standards in all its business activities.

Element provides technically demanding services and skilled people and excellent processes are key to its success. Element recognizes however that Modern Slavery is an issue that could affect its business and its supply chain. For example, Element's key supplies include laboratory equipment, clothing and personal protective equipment and there is a recognized risk of Modern Slavery impacting these supply chains.

¹ This statement sets out the steps taken by (i) EM Topco Limited; (ii) Warringtonfire Testing and Certification Limited; and (iii) Element Materials Technology Environmental UK Limited, which fall within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

TIC COUNCIL & THE UNITED NATIONS GLOBAL COMPACT

Element is a member of the TIC Council, an international association representing independent testing, inspection and certification companies, and must abide by the TIC Council's Compliance Code. Element is committed to meeting the obligations that are laid down by the TIC Council; and our Compliance Programme reflects the requirements of the TIC Council Compliance Code, including one of the core principles on fair labour. Element has a Compliance Committee with responsibility for oversight of compliance matters including in relation to Modern Slavery/anti-human trafficking.

We align with the United Nations Global Compact's (UNGC) ten principles on human rights, labour, environment, and anti-corruption and have UNGC signatory status. Since 2021, this partnership has been key to our mission of making tomorrow safer than today, guiding our efforts in human rights, fair labour, environmental care, and anti-corruption. At Element, we are proud to embed these principles into our core operations, actively contributing to UN sustainable Development Goals.

RELEVANT POLICIES AND PROCEDURES

(i) Modern Slavery Policy

Element has a zero-tolerance approach to Modern Slavery, and the following principles apply to Element's business and its supply chain: (i) child labour must not be used; (ii) any form of forced or compulsory labour must not be used. Workers must be free to leave employment or work after reasonable notice; (iii) passports, visas and other personal documentation should not be taken from employees unless requested to be held by the employee for safekeeping purposes (and, if held for safekeeping purposes, they should be returned to the employee on request); (iv) all forms of debt bondage are prohibited. Workers should not be subject to contracts that tie them into repaying a loan (other than small loans to cover items such as transport costs), excessive accommodation expenses or other costs that they have no or little opportunity to repay; (v) compensation and benefits must comply with local laws relating to minimum wages, overtime hours and other benefits; and (vi) the formation of trade unions and powers of collective bargaining should be respected. The Modern Slavery Policy is available at <https://www.element.com/about-element/modern-slavery-act>.

(ii) Independent third-party whistleblowing hotline

An independent third-party whistleblowing hotline, Safecall, is available to Element employees. The hotline can be used to report any ethical, integrity or compliance issues including violations relating to Modern Slavery. All reports are investigated and appropriate actions are taken. The Audit Committee provides additional oversight of the whistleblowing hotline.

(iii) Element Code of Conduct

Element has established a wide range of policies, procedures and guidelines which set out how we operate - what is expected of our people, and what they can expect from Element in return. They are regularly updated and routinely communicated to colleagues. The principal policies, procedures and guidelines have been brought together in an overarching Code of Conduct, which reflects our commitment to conducting business with honesty and integrity wherever we operate. Click [here](#) to read the Element Code of Conduct.

(iv) Supplier Code of Conduct

A Supplier Code of Conduct sets out details of the behaviours and principles Element expects its suppliers to follow including in respect of ethics and integrity, compliance with laws, anti-bribery and corruption, hospitality and gifts, fraud prevention, fair competition, health and safety and environmental matters and human rights and slavery. This is available at <https://www.element.com/about-element/modern-slavery-act>.

DUE DILIGENCE OF SUPPLY CHAIN AND SUPPLIERS

We maintain open and transparent relationships with suppliers to ensure the consistent quality of our services. We are developing long-term, collaborative supply chain partnerships and aim to work responsibly with our suppliers. Element has Group-wide procurement policies in place and undertakes due diligence when evaluating certain new suppliers. New suppliers onboarded by the shared service centres and procurement team via our new onboarding platform are

considered from a Modern Slavery perspective prior to being engaged; and are required to comply with Element's Modern Slavery Policy and Supplier Code of Conduct. In 2025, we continued to review and enhance our vendor onboarding in the UK, US, and Middle East. Vendor onboarding is now implemented in all countries across MEAP where we operate. To date, Element has had no violations of the Act reported within the Group's supply chains.

CONTRACTUAL TERMS

Element's Standard Terms of Purchase are used in the United Kingdom, the United States, Belgium, Canada, Czech Republic, France, Germany, Italy, India, Japan, Mexico, Qatar, Saudi Arabia, Singapore, South Korea, Spain, Sweden and the UAE (covering its main shared service centres) and include requirements in respect of Modern Slavery.

MODERN SLAVERY RISK AND OUR SUPPLY CHAIN

Building on the Group-wide Modern Slavery risk assessment completed in the earlier years, in 2025, Element commenced screening suppliers using Dow Jones risk and compliance tools. This exercise includes checks for international sanctions, adverse media, and modern slavery and human trafficking risks. The screening enables us to identify and assess potential ethical and regulatory concerns among our vendors. The insights from this process inform our risk assessment methodology and support our efforts to maintain a responsible and transparent supply chain.

TRAINING AND COLLEAGUE ENGAGEMENT

All colleagues complete a training module about Modern Slavery within Element's Code of Conduct training. A detailed Modern Slavery training module is also available to colleagues via Element's training portal. In Q1 2025, members of the Procurement, HR teams as well as all leaders completed this detailed Modern Slavery training module.

Our people are central to the success of our business. Through our regular employee engagement surveys, training programs, town-halls and other open communication channels, we maintain interactive channels to ensure that our colleagues feel well informed and supported. In line with previous years, in 2025 Element carried out a Your Voice pulse survey as part of its continuous colleague listening strategy. Willis Towers Watson, an independent firm, was responsible for collecting and analyzing the responses to the surveys and feeding back summary results to Element's leadership. The Your Voice surveys asked Element's employees for their opinions about a range of topics, such as: day-to-day work, diversity & inclusion, safety aspects and what it's like to work at Element. The responses, combined with others helped management to understand what is important to Element's colleagues, what's working well, and what can be improved to make Element an even better place to work.

This statement was approved by: (i) the Board of EM Topco Limited on 12 February 2026, (ii) the Board of Warringtonfire Testing and Certification Limited on 14 February 2026; and (iii) the Board of Element Materials Technology Environmental UK Limited on 14 February 2026.

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