

Modern Slavery Act Statement 2025

WEBSITE

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This statement is made pursuant to section 54(1)
of the Modern Slavery Act 2015 for the financial
year ended 30 September 2025

DIPLOMA PLC
VALUE-ADD SOLUTIONS

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Policy Statement

Diploma PLC is committed to upholding and promoting respect for human rights across all our operations. Our Human Rights Policy is informed by the principles set out in the UN Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the International Labour Organisation’s Fundamental Conventions. All Group companies are required, as a minimum, to comply with the legislation applicable in the jurisdictions in which they operate.

We are fully committed to eliminating modern slavery¹ in all its forms from our business and supply chains. We support the principles and requirements of the UK Modern Slavery Act (“the Act”) and are focused on identifying and addressing risks related to slavery, human trafficking, child labour and forced or compulsory labour (together, “Modern Slavery”).

The Board of Diploma PLC oversees this commitment and ensures that appropriate systems and controls are in place to prevent Modern Slavery within our operations and supply chain.

About this report

This document constitutes the Modern Slavery and Human Trafficking Statement for Diploma PLC and other relevant Group companies (Diploma) for the 2025 financial year.

It complies with section 54(1) of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Cth), the California Transparency in Supply Chains Act 2010 (CTSCA), and Canada’s Bill S-211.

This statement covers all subsidiaries of Diploma PLC, a full list of which is available in Diploma’s Annual Report 2025, including:

- Diploma Australia Holdings Limited
- Diploma Canada Holdings Limited
- Diploma Europe Holdings Limited
- Diploma Holdings PLC
- Diploma Overseas Limited
- IS-Rayfast Limited
- Shoal Group Limited
- Clarendon Specialty Fasteners Limited

It was prepared in consultation with relevant teams across the Group, which are responsible for managing our modern slavery compliance.

It was approved by the Board on 17th March 2026.

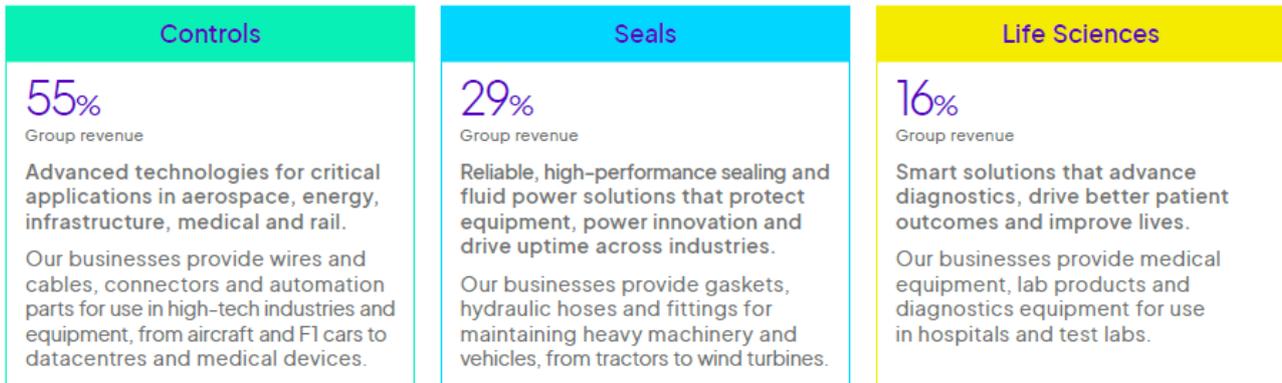
DIPLOMA PLC

Our business and structure

Diploma PLC is a value-add solutions group, providing critical products and services to customers across a wide range of markets. We provide the bolts that hold planes and race cars together, design the seals that make wind turbines work and help surgeons find the best solutions to deliver better patient outcomes.

Diploma PLC comprises 17 entrepreneurial businesses organised into three Sectors – Controls, Seals and Life Sciences – operating across North America, the UK, Europe and Australia. The Group is headquartered in London, England and at the end of 2025 employed nearly 3,400 people. Diploma’s revenue for 2025 was £1,525m with an adjusted pre-tax profit of £315m.

For more details see [Diploma Handbook of businesses.pdf](#)



Our purpose is to innovate, create and deliver value-add solutions for a better future, supported by a distinctive culture and business model that strengthens our relationships with stakeholders and aligns our colleagues and businesses.

We are committed to delivering this purpose in an environmentally, socially and ethically responsible manner. Our values guide our approach to Modern Slavery risk management. In particular, “Doing the right thing” and “Accountability” underpin how we identify, assess and address Modern Slavery risks in our business and supply chains. We expect all colleagues to treat customers, suppliers, business partners and one another with integrity, fairness and respect.

The end-markets that Diploma serves are broad and wide-ranging. They include Aerospace, Infrastructure, Defence, Data centres, Automation, Clean Energy, Healthcare, Water Management, amongst others and we view the risk of downstream human rights issues to be low.

Diploma has clear public commitments to sustainability which include specific targets for Environment, People and Doing Business Responsibly by 2030. The details of these commitments, our actions to achieve them, and our current progress are contained within the [2025 Diploma Annual Report](#) and on the website diplomapl.com.

Our Supply Chains

Diploma PLC operates a decentralised business model comprising approximately 17 specialist businesses across multiple jurisdictions. The Group’s operations and supply chains are predominantly located in countries assessed by external indices, including the Global Slavery Index, as presenting a

lower relative risk of modern slavery, and given that our activities primarily involve the procurement, consolidation and supply of manufactured goods, we consider the overall risk of modern slavery within our own operations to be relatively low. Notwithstanding this, we recognise that the risk of modern slavery can arise in any geography, sector or tier of the supply chain, and we therefore maintain a consistent, risk-based approach to supplier due diligence across the Group.

In line with our decentralised operating model, each business is responsible for managing and mapping its own supply chain (including country risk profile, spend value and product type) and for undertaking supplier due diligence appropriate to its specific risk profile. Supply chains vary by business, reflecting differences in product type, sourcing model, manufacturing processes and geographic footprint. This approach enables risks to be identified and managed at the most appropriate operational level, while remaining aligned to Group-wide standards, policies and oversight.

Across the Group, we source from a diverse supplier base of over 6,000 direct material suppliers. Our sourcing is global, with key supply chain geographies including Europe (with top 10 countries being, UK, Germany, Italy, Spain, France, Switzerland, Austria, Netherlands, Belgium, Denmark and Sweden) Turkey, North America, China, and India. We operate from more than 180 sites worldwide, including a number of manufacturing facilities that support our sales companies across multiple regions.

Most of the products we supply are manufactured using commonly available materials, including iron, steel and other metals, as well as rubber and plastics. While these materials are not inherently associated with elevated modern slavery risk, we recognise that certain manufacturing processes and sourcing regions may present increased risk, particularly at sub-tier levels where visibility is more limited.

OUR APPROACH TO COMBATING MODERN SLAVERY

We are committed to maintaining effective policies, processes and controls designed to prevent, identify and address the risk of modern slavery and human trafficking within our own operations and across our supply chains. Our approach is grounded in internationally recognised human rights standards and reflects the requirements of the UK Modern Slavery Act 2015.

Over the past year, we have strengthened governance and oversight arrangements for modern slavery and human trafficking across the Group by clarifying responsibilities and enhancing coordination between Group and business-level teams, with the Group Sustainability Director holding overall responsibility for implementation. We have adopted a multi-faceted approach focused on risk awareness, prevention, early identification and continuous improvement.

We continue to invest in people, systems and tools to support this approach, including supplier due diligence platforms, risk assessment methodologies and training. These measures are designed to help ensure that individuals connected to our operations and supply chains are treated with dignity and respect, and that potential risks of exploitation are identified and addressed in a timely and proportionate manner.

Our focus remains on embedding responsible sourcing practices, supporting suppliers to meet our standards, and taking appropriate action where risks or concerns are identified, in line with our policies and values.

Our Policies and Governance

Code of Conduct

Diploma is committed to upholding and respecting human rights across all its operations and supply chains. Our Code of Conduct sets out the standards of behaviour expected of all colleagues and provides a clear framework for protecting the rights and dignity of individuals connected to our business.

Through our Code of Conduct, we commit to:

- Prohibiting the use of forced, bonded, trafficked or child labour in our own operations and throughout our supply chains.
- Implementing proportionate due diligence, monitoring and, where appropriate, site visits or audits to help identify and manage risks.
- Taking appropriate action where evidence of forced labour, human trafficking or child labour is identified; and
- Promoting inclusive, safe and respectful working environments.

The Code of Conduct applies to all colleagues and underpins our expectations of ethical behaviour across the Group.

Our Group-wide policies form a core part of our approach to preventing modern slavery and human rights abuses. They establish minimum standards and provide the basis on which we engage with, and set expectations for, our third-party partners.

Supplier Code of Conduct

In 2022, Diploma PLC introduced its [Supplier Code of Conduct](#), which is currently being updated and strengthened as part of a scheduled review in 2025. The Supplier Code of Conduct sets out our expectations of suppliers in relation to ethical business practices, labour standards, human rights, health and safety, and environmental responsibility.

As a global organisation with suppliers operating in a range of jurisdictions, we seek to work with partners who share our values and commitment to responsible business conduct. Suppliers are expected to comply with the principles set out in the Supplier Code of Conduct and to take appropriate steps to identify and address modern slavery risks within their own operations and supply chains.

Human Rights Policy

We introduced a Group Human Rights Policy in 2024, which was revised in 2025. The policy sets out the principles and expectations that guide our approach to respecting human rights and addressing risks of modern slavery and human trafficking.

The [Human Rights Policy](#) applies to all those connected to our business, including employees, suppliers, contractors and other business partners. Our approach is informed by internationally recognised human rights standards and is supported by processes for risk assessment, supplier engagement, training, reporting and continuous improvement.

Key commitments under the policy include:

- Fostering inclusive and respectful workplaces.
- Providing safe and healthy working conditions.
- Respecting freedom of association and the right to collective bargaining.
- Prohibiting forced labour, child labour and human trafficking; and
- Promoting equal opportunity and non-discrimination.

Whistleblowing

The Group operates a company-wide [Whistleblowing Policy](#), supported by an independent, multi-language third-party reporting hotline. This enables colleagues, suppliers and other stakeholders to raise concerns confidentially or anonymously, including concerns related to modern slavery or human rights.

The whistleblowing service is available 24 hours a day, seven days a week, and concerns may also be raised through local management channels. Information about the whistleblowing process is communicated across the Group to promote awareness and encourage individuals to speak up.

All reports are logged and tracked centrally to support appropriate investigation, follow-up and corrective action. We do not tolerate retaliation against anyone who raises a concern in good faith and review themes and outcomes from whistleblowing reports to inform management action and Board oversight.

Copies of all relevant policies are publicly available at:

<https://www.diplomaplc.com/policies/>

Risk Assessment and Due Diligence

Supply Chains

In line with our Human Rights Policy and Supplier Code of Conduct, Diploma applies a risk-based approach to the identification, assessment and management of modern slavery risks within its supply chains. Supplier prioritisation is informed by a range of internal and external risk indicators, enabling resources and due-diligence activities to be focused where the potential risk of harm is greatest.

To support this assessment, we draw on recognised external indices, including the Global Slavery Index, the Corruption Perceptions Index and the Freedom Index, alongside internal data and business knowledge.

Key risk factors considered include:

- **Supplier spend**, which is used as an indicator of the scale and strategic importance of the supplier relationship.
- **Geography**, assessed by reference to both the supplier's corporate location and the location of the manufacturing or service delivery sites used by Diploma PLC; and
- **Product category**, recognising that certain sectors and production processes may present heightened modern slavery risk. For example, manufacturing activities such as electronics production, metal fabrication and labour-intensive assembly are considered to carry increased inherent risk, particularly where multiple sub-tiers are involved.

In line with the Group's decentralised operating model, individual businesses are responsible for conducting due diligence on their own supply chains, in accordance with Group-wide policies and minimum standards. This includes ongoing due diligence on existing suppliers and vetting procedures prior to the engagement of new suppliers. Businesses apply a proportionate, risk-based approach when assessing modern slavery risk, including consideration of the country of manufacture and the nature of the goods or services procured.

Where a potential new supplier does not meet the Group's requirements in relation to modern slavery and human rights, the Group will not proceed with engagement until appropriate policies, controls or remedial actions are in place. For existing suppliers, issues identified through due diligence are addressed through engagement and corrective action, with escalation where necessary.

The Group considers modern slavery risk to be most elevated in certain manufacturing activities and sourcing regions, particularly at sub-tier levels of the supply chain where visibility can be more limited. We continue to take steps to improve risk identification and supplier engagement in these areas.

During the reporting period, no substantiated breaches of the Group's modern slavery policies were identified. However, supplier assessments did identify areas for improvement, which are being addressed through ongoing engagement and monitoring.

In 2025, Diploma PLC entered a partnership with EcoVadis, an internationally recognised supply-chain assessment platform that evaluates suppliers' environmental, labour and human rights, ethics

and procurement practices using evidence-based questionnaires and third-party data. The platform is currently being rolled out in phases, with access expected to be available to all Diploma PLC subsidiaries by the end of 2026.

Direct Operations

The majority of Diploma's operations are based in North America, Europe, the UK and Ireland, and Australasia. At the end of the 2025 financial year, more than 90% of our colleagues were employed in these regions, where external indices indicate relatively lower levels of perceived corruption and higher levels of political rights and civil liberties.

Based on the nature of our activities, which primarily involve the procurement, consolidation and supply of manufactured goods, we consider the overall risk of modern slavery within our own operations to be relatively low. Nevertheless, we recognise that human rights risks can exist in any market or sector, and we therefore maintain appropriate controls and oversight across all locations.

The Group makes limited use of contract labour, which allows management greater oversight of working conditions and remuneration and supports compliance with applicable laws and our Company Values. All businesses have implemented policies and procedures designed to ensure that employees and contract workers are treated fairly and consistently.

Diploma PLC does not charge employees any fees in relation to recruitment. Where individuals are required to have the right to work associated costs are borne by the individual prior to joining the Group. In the small number of cases where Diploma PLC sponsors workers, all sponsorship-related costs are met by the Group.

Our primary safeguards against modern slavery risk within our own operations are our human resources systems and controls, which are designed to embed fair employment practices, ensure compliance with legal requirements and support ongoing monitoring and continuous improvement.

Mitigation & Tracking

Diploma PLC uses a combination of Group-wide standards, supplier engagement tools and ongoing monitoring to mitigate modern slavery risks and to track supplier performance over time.

The Supplier Code of Conduct and the EcoVadis platform are our primary tools for managing and monitoring supplier compliance. Through EcoVadis, suppliers are assessed against a range of criteria covering labour and human rights, ethics, environmental management and responsible procurement. Suppliers are required to provide documentary evidence to demonstrate alignment with the principles set out in our Supplier Code of Conduct. We are in the process of integrating the Supplier Code of Conduct into new supplier contracts.

EcoVadis also incorporates automated news-monitoring technology, which scans publicly available information to identify potential indicators of supplier behaviour that may be inconsistent with our standards, including allegations relating to labour practices or human rights. This monitoring is being rolled out on a phased basis and will initially cover the majority of our key direct material suppliers, representing approximately 55% of total Group supplier spend.

In addition to supporting compliance, the EcoVadis platform provides suppliers with improvement plans and access to training resources, enabling them to address identified gaps and progressively strengthen their practices over time.

Audits form a further element of our approach to supplier engagement and risk mitigation. Several Diploma PLC businesses conduct audits of direct material suppliers located in higher-risk regions, including parts of India and China. These audits are proportionate to the assessed risk and typically cover a range of factors, including labour practices, health and safety, quality and delivery performance.

Where suppliers are identified as falling short of our expectations, our preferred approach is to work collaboratively with them to address issues and drive improvement. This may include agreed corrective actions, enhanced monitoring or follow-up assessments. However, where serious

concerns are identified, or where suppliers fail to engage, refuse to commit to our Supplier Code of Conduct, or do not demonstrate sufficient progress over time, we will take appropriate action. This may include excluding potential suppliers from our supply chain or, in the case of existing suppliers, disengaging from the relationship. We approach disengagement cautiously and only as a final step, recognising that withdrawal may unintentionally worsen conditions for vulnerable workers our preference is to drive corrective action and sustainable improvement before considering exit.

Progress in 2025

During the year, Diploma continued to take practical steps to promote responsible and ethical practices across its operations and supply chains, including actions aimed at preventing modern slavery and human trafficking. This work is supported by our *Delivering Value Responsibly* sustainability strategy, which reinforces expectations around responsible sourcing, supplier standards and ethical business conduct.

Following the review undertaken in 2024 of right to work checks across all UK Diploma businesses, a similar audit was conducted in 2025 across Diploma's eleven US businesses. The audit assessed both the process and the documented evidence supporting right to work verification.

A representative sample of employees (averaging 15% per business) was reviewed, including both new hires and existing employees, spanning pre- and post-acquisition periods. No instances of non-compliance were identified. However, opportunities were identified to strengthen process consistency and standardise practices across businesses

We invested further resources during the year to strengthen supplier monitoring and to support compliance with our minimum requirements. In parallel, we progressed work to improve visibility beyond our key direct suppliers and to enhance associated risk assessments. As part of this, we developed a dedicated supply-chain improvement module within the EcoVadis platform, designed to support smaller suppliers in addressing identified risks, including those relating to modern slavery, through targeted guidance, improvement plans and training resources.

Key activities and outcomes during 2025 included:

- **Supplier Code of Conduct**
By the end of the year, 94% of our key suppliers were aligned with the Supplier Code of Conduct, exceeding our 2030 target of 85%.
- **Training and awareness**
All senior managers and members of procurement teams across all businesses were enrolled in modern slavery and human trafficking training during the year, with a completion rate of 68%. In the specific entities detailed on page 2, completion rates were 78%.
- **Whistleblowing and reporting**
No reports received through the Group's Safecall whistleblowing hotline during the year related to modern slavery. We continue to promote awareness of reporting mechanisms through internal communications, supplier engagement and audit activity.

EcoVadis adoption

By the end of 2025, 25% of key suppliers had been onboarded onto the EcoVadis platform, supporting enhanced monitoring and structured supplier engagement.

Next Steps

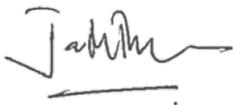
We remain committed to the continuous improvement of our approach to preventing and addressing modern slavery and human trafficking within our operations and supply chains. During 2026, we will continue to strengthen our policies, processes and controls, building on the progress made to date.

Our key priorities for the year ahead include:

- **Expanding supplier alignment**
Extend the application of the Supplier Code of Conduct beyond key suppliers, with the objective of achieving alignment across approximately 60% of total Group supplier spend by the end of 2026.
- **Enhancing training and awareness**
Update our modern slavery and human trafficking training content and expand participation to a broader range of colleagues, with a focus on roles involved in procurement, supply chain management and operational decision-making.
- **Increasing supplier monitoring coverage**
Complete the onboarding of 100% of key suppliers onto the EcoVadis platform, providing coverage of approximately 55% of total Group supplier spend and supporting enhanced monitoring and structured supplier engagement.
- **Strengthening internal assurance**
Incorporate the review of modern slavery and human rights policy compliance into the Group's internal audit programme, to support independent assurance and continuous improvement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ended 30 September 2025 and constitutes Diploma Group's Modern Slavery Statement for 2025.

This statement was approved by the Board of Diploma PLC on 17th March 2026 and signed on its behalf by:



Johnny Thomson
Chief Executive Officer
Diploma PLC

Publication date: 24th March 2026

¹ Diploma PLC defines modern slavery in line with the UK Modern Slavery Act definition: modern slavery encompasses various forms of exploitation, including slavery, servitude, forced or compulsory labour and human trafficking. It is characterised by the exploitation of individuals for personal or commercial gain, often involving coercion or force, resulting in the loss of freedom.