

Finning (UK) Ltd Modern Slavery Transparency Statement

Finning (UK) Ltd. is the UK trading subsidiary of Finning International Inc. Our core business is the distribution, rental and maintenance of Caterpillar machines, engines, equipment and power solutions in the UK. In addition to Caterpillar equipment, we also supply complementary products and services including technology services, fluid analysis, engineering, systems integration and project management. We operate across a number of different market sectors, including agricultural, construction, energy, marine, oil & gas, defence, quarrying, mining and waste. We employ approximately 1549 people in the UK alone.

Our largest supplier is Caterpillar, who manufactures products in various locations globally. Outside of Caterpillar, our main suppliers provide goods and services, such as machine attachments, ancillary equipment, engineering services, parts, logistics, office supplies, facilities management, IT services and professional services. To find out more about the nature of our business, please see our website: www.finning.com.

Our Commitment

We are committed to preventing acts of modern slavery and human trafficking from occurring within both our business and supply chain and we impose those same high standards on our suppliers.

The health, safety and wellbeing of our staff, customers and suppliers are core factors in our strategy and day to day running of our business and every interaction we have.

“Living our values means that how we do things is just as important as the thing we do, as such we are committed to building a safe and inclusive team where every member feels valued. We’re committed to displaying the highest standards of ethical and moral conduct in all our interactions and ensuring the prevention of slavery and human trafficking within our business and supply chain is a key part of this.”

Gary Megarrell, Managing Director.

Our Actions

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chain, we have undertaken a risk review of our supply chain, assessing categories of supplier in terms of risk of slavery and human trafficking and importance to our business. We have then engaged with suppliers in different ways depending on the level of risk. All suppliers registering with our online supplier portal are asked to provide confirmation of compliance with the Modern Slavery Act (“Act”) as part of the registration process and our standard terms and conditions used for procurement activities require suppliers to comply with the principles of the Act. We also ask suppliers to comply with our Supplier Code of Conduct.

In 2023, we commenced a more in-depth review of supplier adherence to the Act, including issuing a detailed questionnaire to our largest suppliers by spend. We also carried out broader due diligence on our main transport suppliers, as part of a wider supplier management exercise. This due diligence covered areas such as environment and anti-corruption practices, as well as Modern Slavery.

Our Policies

As part of our wider commitment to promoting ethical business practices and employee welfare, we also have in place the following policies within our organisation:

- a. Employee Code of Conduct – all employees are required to carry out an online learning module and assessment regarding its content. The Code of Conduct requires employees and suppliers to comply with the behaviours and actions as set out in the Code of Conduct including (i) honouring domestic and internationally accepted labour standards and recognising and supporting human rights, (ii) ethical decision-making and (iii) provides a confidential Compliance Ethics Hotline for employees and suppliers to use to report any issues;
- b. Supplier Code of Conduct – this requires suppliers to comply with Finning's standards of health and safety, ethics and governance;
- c. Whistle-blower Policy – this requires all employees to act with honesty and integrity and makes it a responsibility of all employees to report any non-compliance;
- d. Policies relating to Employee Safeguarding and Wellbeing – these various policies provide, for example, that all employees have access to an Employee Assistance Program, employees are protected from for protection from bullying and harassment, and additional safeguarding is in place for young workers;
- e. Health and Safety – the culture of health and safety is well embedded within Finning. We have multiple tools for communicating with employees, including:
 - i. A mobile app for employees to record all hazards, near-misses and incidents, which enables us to monitor safety throughout the organisation.
 - ii. Regular communications emailed to all employees to promote the importance of health and safety in the workplace.
 - iii. Local Action Teams formed of employee representatives who regularly undertake reviews of their working environment.
- f. Global Sustainability Policy – this sets out, amongst other issues, that we will conduct our business in a transparent, honest, and ethical manner and uphold and protect human rights.
- g. Safeguarding Policy – this out Fining's approach to safeguarding and promoting the welfare of children and vulnerable adults. It applies to all departments and areas of work.
- h. Work Experience Policy - this sets out Fining's approach to taking on people on work experience placements, from work experience students under the school leaving age to apprentices aged 18 or over and to vulnerable adults. It applies to all departments and areas of work.

We are not aware of any instances of modern slavery or human trafficking within our organisation or supply chain. We will continue to develop our policies, training and effectiveness, and our approach to supplier management specifically, in order to combat modern slavery and human trafficking.

This statement has been prepared and approved by Finning (UK) Ltd. in accordance with Section 54(1) of the Modern Slavery Act 2015 and relates to the financial year ending 31 December 2023.

A handwritten signature in black ink, appearing to read 'G. Megarrell', with a stylized, cursive script.

Gary Megarrell
Managing Director Finning (UK) Ltd.
2025