



## MODERN SLAVERY TRANSPARENCY STATEMENT

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015, and covers the actions and activities of **Kronospan Holdings Limited and its subsidiary Companies (Kronospan Limited, Kronoplus Limited, Kronospan Sawmilling Limited, Silva (Chirk) Limited, Silva Recycling Limited, Silva (Corbriggs) Limited and Silva (Napton) Limited** in respect of the financial year ending 30<sup>th</sup> September 2025. It sets out the steps that Kronospan has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

### Organisational structure & supply chains

Kronospan operates its main production site North Wales. This is a vertically integrated site and its manufacturing includes wood-panel products, sawn timber, resins, impregnated paper and value added products. The UK group also includes two waste timber recycling sites that recover valuable raw materials for use in our production process.

Our customer base includes manufacturers, construction, distribution and retail companies based mainly in the UK and Ireland.

We have a wide network of suppliers in the UK and Europe from whom we procure the majority of our subcontract labour, raw materials, engineering equipment and sundry supplies. Wood and residues are sourced using internationally recognised systems for the certification of sustainable forestry management and its supply chain. Purchases of chemicals, plant & machinery items and trading goods may also be sourced competitively on world markets.

### Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Supplier code of conduct:** Kronospan is committed to ensuring that its employees and suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and provide good working conditions. Violations of the supplier code of conduct will lead to the termination of the business relationship.
- **Employee code of conduct:** Our code makes clear to employees the actions and behaviour expected of them when representing Kronospan. We strive to maintain the highest standards of employee conduct and ethical behaviour, managing our supply chain by actively and specifically evaluating and reporting any external activities which are a cause for concern.
- **Anti-Slavery policy:** We have a robust approach to any form of modern slavery. We are committed to preventing slavery and human trafficking in our corporate activities. This policy sets out Kronospan's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

- **Recruitment policy:** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Every employee is provided with a copy of their conditions of employment prior to starting work with us to make them aware of the working time regulations. The employment contract will contain key terms such as working hours, remuneration and holiday entitlement.

Kronospan uses only specified, reputable, registered employment agencies to source temporary labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

- **Whistleblowing policy:** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, how colleagues are being treated, or the supply chains, of Kronospan. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of reprisals.

### **Due diligence**

Kronospan undertakes commercial and operational due diligence when considering new suppliers, and carries out checks on its existing suppliers.

We carry out risk assessments of our supplier base by identifying suppliers which, either as a result of geographical location, industry sector, or the nature of the transaction are considered to be at an elevated risk of modern slavery and human trafficking.

A key area of risk has been identified as chemical products sourced on world markets outside of Europe and North America. Whilst such activities are not considered to be at high risk of slavery or human trafficking, Procurement personnel conduct such negotiations with a heightened level of awareness of the potential exposure to minimise risks. Our procurement director has carried out a number of visits to prospective suppliers in more geographically sensitive areas.

### **Training**

Training and guidance is provided to our workers in procurement and other key roles to raise their awareness of the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### **Performance indicators**

We monitor our own compliance with SEDEX requirements and this is supported independently by periodic SMETA audits to validate our ethical performance. The results of these audits are presented to senior management and relevant personnel.

### **Board approval**

This statement has been approved by Kronospan's Board of Directors. It will be reviewed and updated annually.

**Signed on behalf of the Board of Directors by:**

  
Ludwig Scheibler, CEO

23<sup>rd</sup> March 2026