

Our Modern Slavery Policy





"This statement highlights the action we have taken as a business to assess our operations and supply chain to mitigate any risk of slavery and human trafficking.

The statement relates to the financial year ended 31st December 2025, and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

"At Real Aluminium, we are committed to responsible trading, ethical practices, and full legal compliance.

We ensure that our workforce and supply chain adhere to UK employment laws in full. Our procurement and HR teams receive specific training to identify and address potential modern slavery risks.

We pride ourselves on our staff's commitment to preventing modern slavery and we remain vigilant.

We have implemented a Code of Conduct for our suppliers and expect them to follow it, ensuring respect for all employees across our supply chains.

In summary, we are dedicated to safeguarding the wellbeing of our employees and partners, ensuring modern slavery is not tolerated within both the Real Aluminium and Atlas divisions."

Jamie Newall

CEO

A message from our Chief Executive Officer





Our Company

Real Aluminium Products Limited includes Real Aluminium and Atlas Roof Solutions. We manufacture and distribute home improvement products such as aluminium windows, doors, and roofing across the UK.

Our procurement and HR teams work closely to foster continuous development and innovation, creating a culture where people collaborate and connect.

We take pride in our teams' safety and wellbeing, enforcing a zero-tolerance policy towards modern slavery and human trafficking.

We conduct our business ethically, expecting the same from our suppliers and their supply chains.

Our focus is on improving processes, complying with the Modern Slavery Act, and maintaining high standards.

Our approach to modern slavery is integrated within the following policies:

- Confidential Reporting (Whistleblowing) Policy
- Anti-Bribery and Corruption Policy
- Bullying and Harassment Policy
- Recruitment Policy

Due diligence processes

Our recruitment and people management systems ensure all employees are legally entitled to work in the UK and protect them from abuse or coercion. We expect everyone working with us to uphold the following measures against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy
- We are committed to addressing modern slavery risks in our operations and supply chain alongside suppliers and stakeholders
- We take a risk-based approach to our contracting processes and keep them under review
- We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties
- We request that our suppliers confirm their compliance with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking, this may necessitate them obtaining third party's agreement to adhere to this code
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action



Staff training

- **We aim to make our staff aware of the Modern Slavery Act 2015, including the definitions of slavery and human trafficking.**
- **We tell staff what to do if they suspect a case of slavery or human trafficking.**
- **This statement is made pursuant to Section 54(1) of the Modern Slavery Act. 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2025 and was approved by the Board of Directors on 21st January 2025.**

Parts of the business where there is a risk of slavery, and steps taken to assess and manage the risk

The business has an extensive supply chain with a wide range of suppliers and partners, some of whom subcontract work or rely on recruitment agencies.

Certain suppliers, particularly those outside the EU, may face higher risks.

Last year, we began developing a register of approved suppliers and will soon ask them to confirm their adherence to our code of conduct. We are also enhancing policies to improve internal standards and monitor suppliers.

We recognize that modern slavery involves exploiting vulnerable individuals for commercial gain, and migrant and agency workers are at high risk.

To mitigate this, we will use reputable employment agencies, ensure agency workers have written contracts, and audit to confirm they haven't paid fees to obtain work.

Aims:

- **Ensure that suppliers who provide us with agency or permanent staff confirm their adherence to our Code of Conduct.**
- **Contact suppliers in potentially higher risk categories to check what assurance arrangements they have in place.**
- **Revise our procurement strategy to include reference to modern slavery and human trafficking.**
- **Ensure our staff are aware that they can approach any member of the HR team or management if they have concerns about human trafficking or compliance with the Modern Slavery Act. In addition, we will communicate annually that the Whistleblowing policy is a tool for raising any potential concerns.**



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ATLAS
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