

## Modern Slavery Statement

Derek Raphael Holdings Limited is committed to continuously improving its high standards to combat slavery and human trafficking in its business and in its supply chain, acting ethically and with integrity in its business relationships.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Derek Raphael Holdings Limited's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2025. It covers the activities of Derek Raphael Holdings Limited and its wholly-owned subsidiaries: Derek Raphael & Company Limited and DRC Properties Limited.

Derek Raphael Holdings Limited's employees have chosen freely to work for us or one of our subsidiaries and do so in an equitable environment free from any form of discrimination, they enjoy the right to have their voice and opinion heard, be it as an individual or collectively, if they feel the need to do so. All work undertaken is age-appropriate, those under 18 who come into our business will do so as part of their education and further development. Everyone will be supported by whatever means necessary to maximise their contribution to the company. Our workplace will leave no place for forced labour, human trafficking or slavery.

Derek Raphael Holdings Limited is acutely aware of the need to ensure that the services and materials it or any of its subsidiaries supply reflect the values we stand for. Through our activities and our supply chain there is no place for slavery, human trafficking or forced labour.

It is also important to us that our supply chain upholds and shares these values and that any material tainted by unacceptable labour standards should not be traded or supplied. The nature of international trade does make absolute confidence difficult to acquire, we have endeavoured to create a working culture where everyone who works for Derek Raphael Holdings Limited or one of its subsidiaries understands all the risks of slavery, trafficking and exploitative workplaces and are wholly committed to eliminating them.

Anyone in our supply chain, customer base or our employees can, and are encouraged to, report concerns for further investigation to our company secretary.

We ensure counterparties are known to the business and are visited, where possible, to be evaluated before any trading occurs.

Through active participation in industry forums such as IMOA, we are aware of any rogue operators and risk factors involved within commodities, regions or individual businesses.

We ensure the origin of material supplied to us or supplied by us is identified and backed-up with documentation wherever possible. We ensure this information is also communicated to our customers in line with their own requirement.

We will continue to review our procurement process and engage with all suppliers to Derek Raphael Holdings Limited or one of its subsidiaries. We also plan to review our procedures with our employees and will provide further training on modern slavery where it is found to be appropriate.

## Human Rights Policy

We recognise the UN Universal Declaration of Human Rights. We are committed to enacting the ten guiding principles of the UN Global Compact in the protection of fundamental human rights across all areas of our business and throughout the supply chain in which we are involved. We assess our customers and suppliers in accordance with the following ten principles and strive to ensure compliance. Where there is evidence of non-compliance we will not enter into, or continue, a business association.

United Nations Global Compact – 10 guiding principles:

### **Human Rights**

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

### **Labour**

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

### **Environment**

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

### **Anti-Corruption**

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

This statement has been approved by our Board of Directors on 13<sup>th</sup> January 2026 and hence has the full commitment of Derek Raphael Holdings Limited and its subsidiaries.

Andrew Raphael  
*Director*  
13<sup>th</sup> January 2026