

BTM Group Global Modern Slavery Policy

Purpose and Commitment

BTM Group Global (BTM) is a global design, manufacturing and distribution business operating in the safety footwear sector. The Group is committed to conducting business ethically, responsibly and in a manner that respects internationally recognised human rights.

This policy establishes the Group's formal position and minimum requirements for the prevention, identification, mitigation and remediation of modern slavery risks within its operations, supply chain and business relationships.

BTM prohibits all forms of modern slavery, including forced labour, prison labour, indentured labour, bonded labour, debt servitude, state-imposed forced labour, human trafficking and the worst forms of child labour.

The Group requires equivalent standards of conduct from its suppliers, manufacturers, agents, labour providers, distributors and other business partners.

Scope

This policy applies to all BTM directors, officers, employees, contractors and controlled entities. It also applies to all suppliers and business partners involved in the design, manufacturing, sourcing, logistics, warehousing, distribution, marketing or sale of BTM products and services.

Suppliers are expected to communicate the requirements of this policy to their own workers, recruitment agents and upstream suppliers, and to maintain systems that support compliance across all tiers of the supply chain.

Definitions

For the purposes of this policy, modern slavery refers to situations where coercion, threats, deception, abuse of vulnerability or restrictions on freedom are used to exploit a person and undermine their ability to freely choose or leave work.

It includes forced labour, human trafficking, debt bondage, servitude, slavery-like practices, forced prison labour, child labour and recruitment-related exploitation.

Child labour means work that deprives children of their childhood, education, health, safety or development, or work performed below the minimum legal working age. Juvenile workers who are legally permitted to work must receive appropriate protections, including restrictions on hazardous work, excessive hours and night work.

Policy Standards

All employment must be freely chosen. Workers must not be forced, coerced, threatened or deceived into work.

Workers must not pay recruitment fees, deposits or other costs to obtain or keep employment. Where such fees are identified, reimbursement must be provided promptly.

Workers must retain control of their identity documents and have freedom of movement, including the ability to leave employment in accordance with law and contract.

All workers must receive written employment terms in a language they understand before employment begins, including wages, working hours, benefits, accommodation arrangements and any lawful deductions.

Child labour is prohibited. juvenile workers must be protected in accordance with applicable laws and international labour standards.

Wages, working hours, overtime and benefits must comply with applicable law, employment contracts and BTM supplier standards.

Workers must have access to safe, confidential and non-retaliatory grievance channels.

Suppliers must comply with applicable sanctions, trade restrictions, labour laws and responsible sourcing requirements.

Governance and Accountability

The executive leadership team/ CSR committee has ultimate oversight of this policy and the Group's approach to modern slavery risk management. Executive leadership is responsible for ensuring that this policy is implemented effectively and that modern slavery considerations are embedded in relevant business functions, including sourcing, purchasing, production factories, logistics, human resources, product development, compliance and commercial decision-making.

Day to day operational responsibility is assigned to the functions responsible for compliance, sourcing, product development, supply chain, human resources, legal and risk management.

These functions are accountable for implementing supplier onboarding controls, due diligence, monitoring, corrective action, remediation, training and reporting processes in accordance with this policy.

Risk Assessment and Due Diligence

BTM will take a risk based approach to identifying and managing modern slavery risks across its supply chain, including finished goods manufacturers, component suppliers, material suppliers, logistics providers, labour providers and other indirect suppliers.

Risk assessment will consider factors such as country and regional risk, product and material risk, supplier performance, use of migrant, temporary or outsourced labour, recruitment practices, worker demographics, subcontracting, audit results, grievance data, media and NGO reports, government advisories and stakeholder input.

Due diligence may include supplier self-assessments, contractual commitments, onboarding checks, announced or unannounced audits, worker interviews, document reviews, recruitment fee investigations, corrective action plans and follow up verification.

Supplier Requirements

All suppliers must comply with this policy, applicable laws and any BTM supplier code, supplier manual, purchase terms or contractual standards.

Suppliers must maintain accurate employment, wage, working-hour, age-verification, recruitment and subcontracting records and provide them to BTM or its representatives upon request.

Suppliers must not engage subcontractors.

Responsible Recruitment and Migrant Workers

BTM recognises that migrant workers can face heightened vulnerability to exploitation. We support responsible recruitment practices aligned with the principle that no worker should pay for a job.

Workers must receive clear information on employment terms before departure, retain control of passports and personal documents, have freedom of movement and be protected from debt bondage, deposits, recruitment fees and misleading recruitment practices.

Where recruitment fees or related costs are identified, suppliers must investigate, document findings, reimburse affected workers and implement corrective actions to prevent recurrence.

Monitoring, Remediation and Consequences

Where an actual or potential modern slavery issue is identified, BTM will seek prompt investigation and appropriate remediation.

Remediation must prioritise the safety, dignity and best interests of affected workers and may include repayment of recruitment fees, correction of contracts, return of identity documents, payment of wages owed, safe repatriation, education support for affected children, improved management systems and independent verification.

BTM's preferred approach is to remain engaged with suppliers to correct root causes, improve management systems and protect affected workers. However, serious, repeated or unremediated breaches may result in escalation measures, including enhanced monitoring, suspension of orders, refusal to onboard a supplier, termination of the business relationship, or notification to relevant authorities where required by law.

Grievance Mechanisms and Non-Retaliation

BTM expects workers and stakeholders to have access to safe, confidential, accessible and effective channels to raise concerns.

Suppliers must not retaliate against any worker or third party who raises a concern, cooperates with an investigation or participates in remediation.

Reports may be raised through local management, worker representatives, supplier grievance systems, BTM contacts or other approved reporting channels. Concerns involving immediate risk to a worker's safety must be escalated urgently.

Training and Awareness

BTM will provide appropriate training and guidance to employees whose roles influence modern slavery risk, including sourcing, procurement, product development, logistics, compliance, human resources and supplier management.

Training may cover responsible recruitment, forced labour indicators, child labour prevention, supplier due diligence, grievance handling and remediation expectations.

Suppliers are expected to train relevant managers, supervisors, human resources personnel, recruitment agents and workers on this policy and on the practical controls needed to prevent modern slavery.

Reporting, Review and Continuous Improvement

BTM will periodically review the effectiveness of its modern slavery risk management programme using indicators such as supplier assessment results, corrective action closure, training completion, grievance data, worker interview findings, recruitment-fee investigations, stakeholder feedback and progress against action plans.

This Policy will be reviewed at least annually or when there are significant changes to legal requirements, BTM's operations, sourcing regions, product categories or supply-chain risk profile.

Approval and Ownership

Policy owner	BTM Group Global Leadership Team
Approved by	BTM Executive leadership Team/ CSR committee
Applies to	BTM Group Global operations, employees, suppliers, labour providers and business partners
Review frequency	Annual, or earlier where required by law, business change or risk profile
Effective date	01/09/2026
Next review date	01/09/2027