



Zotefoams plc (the “Company”)

Modern Slavery statement for the year ended 31 December 2025

Prepared in accordance with section 54(1) of the Modern Slavery Act 2015

This statement is made on behalf of Zotefoams plc and its subsidiaries (collectively ‘Zotefoams’).

Introduction from Ronan Cox, Group CEO

Zotefoams recognises that businesses can play an important role in protecting human rights and have a responsibility to respect and promote them within their sphere of influence.

We are committed to helping to prevent slavery and human trafficking in our operations and supply chains and to acting ethically and with integrity in all our business relationships.

We respect the human rights of all employees, including ensuring that employees have the freedom to join a union, associate, or bargain collectively without fear of discrimination against the exercise of such freedoms. We remain committed against the use of forced labour and child labour and continue to apply the Employer Pays Principle, formalising our long-standing Group-wide commitment to recruitment costs being borne by the employer, not the employee.

Our partners and suppliers are required to adhere to the principles reflected in our anti-bribery and corruption, anti-fraud, ethics and whistleblowing, policies and, where relevant, our supplier due diligence and onboarding requirements, which includes adherence to our Code of Conduct policy.

<https://www.zotefoams.com/downloads/policy-statements/>

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

Modern slavery in all its forms, including human trafficking, forced labour and servitude, is wholly unacceptable. We aim to identify, assess and mitigate the risk of modern slavery and human trafficking in our business and supply chain.

We have zero tolerance of slavery or human trafficking and are committed to enforcing effective systems and controls designed to reduce the risk of slavery and human trafficking taking place anywhere in our operations or supply chain.

ORGANISATION'S STRUCTURE AND ITS BUSINESSES

Zotefoams is a world leader in high-performance foams, serving demanding applications where performance, reliability and sustainability are critical. The group’s business is organised around three market verticals: Consumer & Lifestyle, Transport & Smart Technologies, and Construction & Other Industrial. Zotefoams also uses its own materials to manufacture T-FIT® advanced insulation for demanding industrial markets¹.

¹ AZOTE®, ZOTEK® and T-FIT® are registered trademarks of Zotefoams plc.



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Zotefoams' revenue for the year ended 31 December 2025 was £158.5m.

Zotefoams neither tolerates nor condones modern slavery in its operations or supply chains in any part of the world.

ZOTEFOAMS EMPLOYEES

Subject to any local law and business operational requirements, Zotefoams aims to offer unambiguous and fair terms of employment and provide employees with appropriate opportunities to learn, develop their skills and progress in their careers. Zotefoams respects employees' rights of privacy and the access and use of their personal information is governed by our applicable data protection requirements.

Where it is legal to do so, employees have the freedom to join a union, associate or bargain collectively without fear of discrimination against the exercise of such freedoms.

Zotefoams recognises the Living Wage as an important benchmark in the UK and takes it into account in its approach to pay. Across all geographies, Zotefoams is committed to fair and responsible pay practices, taking into account local market conditions, applicable legal requirements and the nature of the role. Employees receive paid holidays in line with applicable legal requirements, and Zotefoams remains committed to responsible employment practices.

Zotefoams is committed not to using forced or child labour and prohibits the use of worker-paid fees or the confiscation of workers' original identification documents by any party acting on its behalf, such as an employment agency.

Zotefoams has a Whistleblowing Policy in place, under which all Group employees (as well as contractors, consultants, trainees, casual and agency staff) may raise any concern in relation to suspected wrongdoing or danger at work which is in the public interest. The Policy is publicly available on our website.

Given the measures in place, Zotefoams considers the risk of modern slavery in its own operations to be low.

OUR SUPPLY CHAINS

Our main operational suppliers include large polymer companies supplying polymer resins for our manufacturing processes, utility companies for our energy and water usage, freight forwarders, engineering and maintenance suppliers, providers of consultancy services and temporary staff.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

The Company considers that its main exposure to the risk of modern slavery or human trafficking lies in its supply chains. This is because they involve the provision and use of labour.

We continue to conduct an annual risk assessment of major suppliers, identified by invoiced amount over £100,000 in one of the last two years. This process forms part of our supplier management process and modern slavery audit. It requires suppliers to declare, to the best of their knowledge, that their organisation and supply chains are free from slavery and that they



adhere to the Modern Slavery Act 2015 and the principles of Zotefoams' anti-bribery and corruption, anti-fraud and ethics policies.

The annual supplier questionnaire includes review of ethical issues including pay, working hours, sick leave, holiday pay and the employment of minors. It also requests declarations relating to OHSE performance and sustainability targets and risks. Issues or evidence of non-compliance are followed up by telephone interviews, and all measures and risks are reported through business risk matrices.

All suppliers are required to adhere to the Supplier Code of Conduct which is also located on Zotefoams company website.

In addition, our supplier compliance questionnaire was updated on 1 July 2025. It requires suppliers to confirm whether they have a modern slavery statement or equivalent anti-slavery policy, whether modern slavery training is provided to staff, whether minimum wage, holiday pay, sickness pay and overtime pay are provided, whether reference checks are performed, whether minors are employed, whether compulsory overtime exists, whether their own supply chain partners are required to provide modern slavery policies, and whether any incidents of non-compliance have been noted in the past year.

In assessing risk, the Company considers factors including geographic exposure, sector-specific risk, workforce composition (including use of agency labour) and the nature of services provided. These factors are used to inform the prioritisation of supplier engagement and follow-up.

Based on the information provided through these assessment processes, suppliers reviewed were not identified as presenting a high risk of modern slavery. These assessments depend in part on supplier disclosures and do not constitute independent verification in all cases.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance of slavery and human trafficking. To help ensure that those in our supply chain and contractors comply with our values, supplier onboarding and review incorporates adherence to Zotefoam's ethics, modern slavery, anti-fraud and anti-bribery and corruption requirements and the Supplier Code of Conduct policy.

Our terms of purchase require suppliers to comply with applicable anti-slavery laws and to adhere in their own business dealings to the principles set out in Zotefoams' ethics, anti-bribery and corruption and anti-fraud policies, and the Supplier Code of Conduct. Suppliers may also be asked to confirm in writing what checks and steps they have taken in respect of their own supply chains to prevent bribery, corruption and slavery.

We have a dedicated compliance capability, comprising procurement staff trained in governance and legal issues.



TRAINING

To support awareness and understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide targeted compliance training through our online platform, Zotefoams Learning Management System (LMS).

Under the compliance programme procedure, all new joiners are notified of required compliance training during onboarding and are notified when they need to complete assigned courses or policy acknowledgements. Refresher training is reissued on a rolling two-year basis, with automated reminders, escalation to line managers and the Group Executive Team where training is overdue. The compliance training matrix includes specific modern slavery courses for the Group Executive Team, procurement, HR and payroll teams.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We measure how effective our processes are in helping to identify and manage the risk of slavery and human trafficking in our business and supply chains.

As a key performance measure, we track how many suppliers are required to complete the risk assessment questionnaire, obtain responses from both new and existing suppliers, and monitor how many suppliers fail to meet the standard required and are therefore not authorised for use as a percentage of suppliers assessed.

ECOVADIS AND SUPPLIER SUSTAINABILITY ASSESSMENT

During the year ended 31 December 2025, Zotefoams entered a contract with EcoVadis as its global sustainability assessment platform. From 1 June 2026, Zotefoams will adopt EcoVadis to support oversight of environmental, social and ethical performance within its supply chain.

EcoVadis provides a standardised external assessment framework under which participating suppliers are assessed based on documented policies, practices and disclosures. The platform generates scorecards and risk indicators which may assist in identifying areas of potential concern and prioritising supplier engagement.

Zotefoams intends to use EcoVadis as part of its existing supplier due diligence and procurement processes, including supporting supplier screening, informing risk-based prioritisation and providing a framework for ongoing supplier engagement and improvement where appropriate.

Zotefoams will also use EcoVadis to manage areas under sustainability, climate and environmental, as well as any social and governance areas if required.



ZOTEFOAMS

Implementation will be phased and will initially focus on a defined subset of suppliers. The extent of coverage will be expanded over time based on business priorities and resource availability.

Adoption of EcoVadis does not replace existing compliance processes, including supplier questionnaires and contractual requirements, and does not in itself guarantee that risks are identified or mitigated. Zotefoams will continue to rely on a combination of internal controls, supplier engagement and judgement in assessing and managing risks in its supply chain.

APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ended 31 December 2025. It was approved by the Board on 30 June 2026.

Ronan Cox,
Group CEO
Zotefoams plc
30 June 2026