

Modern Slavery Policy

Purpose	To outline the policy, procedures and controls to be adhered to for Identifying and tackling modern slavery
Scope	This policy applies to all UNICAT and Magma Group entities, including: - Jemmtec Ltd. trading as UNICAT Catalyst - Jemmtec Ltd. trading as Magma Ceramics - Magma Combustion Engineering Limited (MCEL) trading as UNICAT Technologies - UNICAT Catalyst Technologies, LLC. This policy does not form any part of an employee's contract of employment and may be revised accordingly.
Policy statement	By introducing this policy, the Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.
Procedures and enforcement	This policy is designed to ensure that the Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. It also serves, to ensure that employees can recognise the signs of modern slavery and the procedures to follow.
Forms and instructions	
Revision Dates	10 th August 2026
Related Information	Recruitment Policy
Support Contact:	HR team
Author	HR Team
Control Version	6 th April 2023
Approved	D. Harlock

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Modern Slavery Policy

Organisation

This Policy applies to UNICAT and Magma Group (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2026.

Organisational structure

The Group is owned by Private Equity firm the White Deer Group and is managed by the CEO – Mark Stuckey.

The Organisation operates across multiple locations in the United Kingdom, the United States and Vietnam, including:

- **UNICAT Catalyst** – head office and manufacturing facility in **Dewsbury, UK**
- **Magma Fibre Shapes** – manufacturing facility in **Bolton, UK**
- **Magma Ceramics** – manufacturing facility in **Wallasey, UK**
- **UNICAT Technologies** – research facility in **Huddersfield, UK**
- **UNICAT Catalyst Technologies, LLC** – manufacturing facility in **Alvin, Texas, USA**
- **Magma Vietnam** – operations in **Vietnam**

The organisation is involved in the manufacture and supply of provider catalyst technology, specialist ceramic refractories, and related services.

The labour supplied to the Organisation in pursuance of its operations is carried out across its UK, US and Vietnam locations and through its wider supply chain network.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

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Modern Slavery Policy

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

Supply chains

We have reviewed our purchases to understand the nature of our suppliers. These include freelancers, consultants and companies providing a wide range of goods and services to help us deliver our aims and objectives.

Risk Assessment and Due Diligence Processes for Slavery and Human Trafficking

The Organisation has in place systems to mitigate the risk of slavery and human trafficking occurring in our supply chains, allowing us to assess, identify, address and monitor risk areas. We assess the risk of slavery or human trafficking occurring in our supply chains and apply enhanced checks where higher-risk areas are identified.

Existing supply chain

As part of our risk management process, we have carried out a risk assessment to consider any existing or future arrangements with third parties. This included identification of:

- All agencies we use to provide staff or services, where there is a heightened risk of poor practice, particularly where they employ non-UK nationals or in light of the services the staff are asked to provide;
- Suppliers whose work involves a high level of physical labour; and
- Relationships involving suppliers operating outside the UK, in countries where controls on employment practices may be weaker.

We assessed the responses and identified risk areas so that we could review those relationships in more detail.

Future suppliers

We will carry out risk assessments for new suppliers to consider the likelihood of maltreatment of staff or other unsatisfactory factors. This may mean that we decide not to work with them or seek further information, or assurances, before proceeding. For new suppliers where a higher risk is identified:

- If the supplier is required to comply with the Modern Slavery Act 2015, we will review their own published policies on modern slavery.

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		Revision Date:	Aug-2027

Modern Slavery Policy

- For other suppliers, we will seek declarations that they meet appropriate requirements and may ask them to give information on their working practices.
- We will apply appropriate vetting procedures, based on the level of risk identified, to ensure we are comfortable that any risks involving slavery can be identified and addressed promptly.
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Supplier Adherence to Our Policy

To ensure all those in our supply chain and contractors comply with our policy, we have in place a supply chain compliance programme. This consists of contractual warranties in our agreements with suppliers, site visits (where deemed appropriate and practically possible) and regular audits to check compliance with our policies and procedures. Representatives from our Legal, Human Resources and Finance Departments support and uphold the programme.

Raising Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide updates to our staff via our intranet and internal newsletters/briefings and by providing both written and oral reminders of good practice.

Recruitment Policy

Part of our recruitment policy involves reducing reliance of external staffing suppliers and where possible hiring directly, except in exceptional circumstances. For further detail on this, please refer to the Recruitment Policy.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval:

Signed:



Print name: Debbie Harlock

Job Title: Group Director HR & Development

Date: 10th August 2026

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