

MODERN SLAVERY STATEMENT

PPN-009

RoMark Labels Limited [*RoMark Labels, RoMark, RML*] is a private limited company, governed by its directors, registered in England and Wales (*company registration number: 08678012*) with the head office located at North Farm House, Wiston Estate, Washington, Pulborough, RH20 4BB. RoMark holds no offices overseas but does supply worldwide.

RoMark Labels is an OEM and supplier of high-performance, durable labels, and a supplier of labelling equipment and software for the laboratory and industrial sectors. (*SIC: 18121–Manufacture of printed labels*).

Classified as an SME business; RoMark is not part of a group structure/consortium but does use material suppliers.

Modern Slavery Policies

RoMark Labels Limited operates a zero-tolerance approach to modern slavery in any capacity. RoMark is committed to preventing modern slavery and human trafficking in all business activities through every stage.

Modern Slavery Policy

RoMark Labels Limited is committed to preventing modern slavery and human trafficking in all aspects of its business and supply chains. We operate a zero-tolerance approach to slavery, servitude, forced or compulsory labour, and human trafficking, and are committed to acting ethically, responsibly, and transparently in all our business relationships.

This policy applies to all employees, directors, contractors, suppliers, and third parties working on behalf of RoMark. We are committed to ensuring that all work is undertaken voluntarily, that workers are treated fairly, lawfully, and with dignity and respect, and that applicable employment, labour, and human rights laws are always complied with.

RoMark seeks to work with suppliers and partners who share its commitment to ethical business practices. We expect third parties to take reasonable steps to prevent modern slavery and human trafficking within their own operations and supply chains. Where concerns are identified, RoMark reserves the right to review, suspend, or terminate relationships as appropriate.

All employees and contractors are expected to remain alert to the risk of modern slavery and to report any concerns in accordance with RoMark's Whistleblowing Policy. RoMark encourages individuals to raise concerns in good faith and will not tolerate retaliation. Any reports will be taken seriously and investigated in a proportionate manner, with appropriate action taken where necessary.

This policy is communicated internally and reviewed periodically to ensure it remains effective and appropriate to the size and nature of RoMark Labels' operations.

Code of Conduct

RoMark Labels Limited Code of Conduct sets out the standards of behaviour expected of all employees and contractors and promotes ethical, lawful, and responsible business practices. It requires compliance with applicable laws and regulations and respect for the rights, dignity, and wellbeing of individuals.

The Code of Conduct prohibits any form of forced, compulsory, or exploitative labour and requires that all work is undertaken voluntarily and under lawful conditions. Employees and contractors are expected to act in accordance with the Code of Conduct at all times and to raise concerns where they believe these standards are not being met.

Supplier and Third-Party Standards

RoMark Labels Limited seeks to engage with suppliers, service providers, and business partners who share its commitment to ethical conduct and respect for human rights. RoMark expects third parties to comply with applicable employment, labour, and human rights laws and to take reasonable steps to prevent modern slavery and human trafficking within their operations.

Where concerns relating to modern slavery are identified, RoMark will take proportionate and appropriate action, which may include engaging with the supplier to address the issue, reviewing the business relationship, or terminating the relationship where necessary.

Whistleblowing Policy

RoMark Labels Limited's Whistleblowing Policy provides a mechanism for employees and contractors to raise concerns about wrongdoing, including potential modern slavery or human trafficking, in a confidential and responsible manner with zero risk of a sanction.

RoMark encourages individuals to speak up without fear of retaliation or adverse treatment. All concerns raised are taken seriously and investigated appropriately, with suitable action taken where required.

Our Risk of Modern Slavery

RoMark Labels Limited recognises that the risk of modern slavery is generally higher within supply chains rather than within its direct operations. Due to the nature of the Company's business and its primary operations being based in the United Kingdom, the Company considers the overall risk of modern slavery within its own workforce to be very low.

Potential risks may arise in relation to third-party suppliers, particularly where goods or services are sourced indirectly or where suppliers rely on subcontracting. This includes suppliers involved in the provision of hardware, equipment, or outsourced services.

RoMark seeks to mitigate these risks by working with reputable, UK-based suppliers and service providers and by maintaining awareness of modern slavery risks within its supply chain. RoMark continues to monitor its operations and supplier relationships to identify and address potential risks where appropriate.

Our Due Diligence

RoMark Labels Limited takes a proportionate approach to due diligence in relation to modern slavery, appropriate to the size, nature, and risk profile of its operations. Due diligence processes are primarily focused on RoMark's supply chain, where the risk of modern slavery is considered to be higher.

RoMark seeks to work with reputable suppliers and service providers, using only suppliers based in the United Kingdom where employment and labour standards are well regulated. Where appropriate, suppliers may be asked to confirm their compliance with applicable labour and employment laws and to demonstrate a commitment to ethical business practices.

If concerns relating to modern slavery are identified, RoMark will take appropriate action, which may include further engagement with the supplier, reviewing the business relationship, or terminating the relationship where necessary. RoMark keeps its approach to due diligence under review to ensure it remains effective and proportionate.

Training

RoMark Labels Limited ensures that all employees and contractors are made aware of modern slavery and their responsibilities under this policy. Training and guidance are provided during onboarding and on an ongoing basis as appropriate to the size and nature of the business. Employees are encouraged to recognise the signs of modern slavery and to report any concerns promptly in accordance with the Whistleblowing Policy.

Tackling of Modern Slavery KPI

RoMark Labels Limited monitors the effectiveness of its approach to preventing modern slavery through ongoing review of its policies, supplier relationships, and internal awareness. Key indicators include the completion of employee training, the number of suppliers engaged with in accordance with RoMark's standards, and the reporting, tracking, and resolution of any concerns raised.

RoMark regularly reviews its processes and policies to ensure they remain appropriate to the size, nature, and risk profile of the business, and to identify opportunities to strengthen its approach where necessary.

| Area | KPI | Measurement / Target | Review Frequency |
|------------------------------------|----------------------------------|----------------------------------------------------------------------------------------------------------|------------------|
| Governance & Policy | Policy review completion | 100% of modern slavery and ethical policies reviewed and updated where required | Annually |
| | Management oversight | Senior management review of modern slavery risks completed | Annually |
| Awareness & Culture | Employee awareness | 100% of employees provided with basic awareness information on modern slavery risks and reporting routes | Annually |
| | Risk review | Internal review of modern slavery risks undertaken | Annually |
| | Incident prevalence | 0 substantiated modern slavery incidents identified within operations | Continuous |
| Whistleblowing & Remedy | Reporting mechanism availability | Confidential and anonymous whistleblowing mechanism available to all workers | Continuous |
| | Report response time | 100% of reports acknowledged within 1 day | Ongoing |

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|--------------------------------|-------------------------------|-----------------------------------------------------------------------------------|------------|
| | Investigation rate | 100% of reported concerns investigated and outcomes recorded | Ongoing |
| | Protection from retaliation | 0 retaliation incidents following whistleblowing disclosures | Continuous |
| Responsible Recruitment | Worker-paid fees | 0 cases of worker-paid recruitment fees identified | Continuous |
| | Document retention | 0 instances of worker identity documents being retained or confiscated | Continuous |
| | Worker control of documents | 100% of workers retain control of personal identity documents | Continuous |
| Supply Chain Oversight | Supplier risk awareness | Basic labour-risk checks applied to new suppliers where appropriate | Ongoing |
| | Communication of expectations | 100% of suppliers made aware of RoMark's ethical and human-rights expectations | Ongoing |
| | Tier 1 incidents | 0 known modern slavery incidents identified within Tier 1 suppliers | Continuous |
| Continuous Improvement | Due-diligence review | Review of due-diligence approach completed, with actions logged where required | Annually |
| | Improvement planning | Year-on-year improvement actions identified, even where no incidents are reported | Annually |

Approval

This Modern Slavery Statement has been approved by RoMark's directors and reflects the steps taken by RoMark Labels Limited during the financial year to

prevent modern slavery and human trafficking within its operations and supply chains.

The directors take ultimate responsibility for ensuring the statement is accurate and that RoMark continues to act ethically and responsibly.

Name: MARK BOWDEN

Signature: 

Position: MANAGING DIRECTOR

Date: 09/01/2026