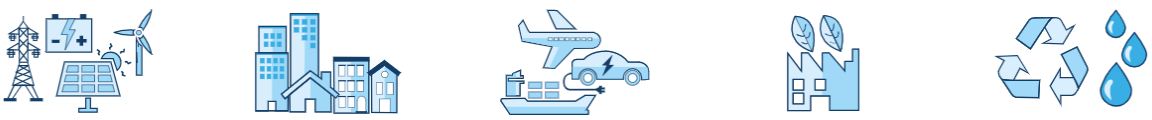
CARBON LIMITING TECHNOLOGIES: MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDED 31st OCTOBER 2026 ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015

November 2026



Our Business, Structure and Supply Chains

Carbon Limiting Technologies (CLT) supports small and medium-sized enterprises (SMEs) commercialise new technologies and accelerate business growth. We provide incubation support and business expertise to help companies secure sales, attract investment and scale up. CLT has helped over 350 clean tech firms use scarce resources strategically to commercialise and grow. CLT employs five people, including three Directors, and operates on an Associate model with approximately 23 Associates working on specific projects. The Associates operate through a mixture of their own companies and as sole traders.

CLT's main business is conducted in the UK, working for government departments and other publicly funded bodies, but the organisation is starting to work on UK funded projects overseas, including India, Mexico and Brazil.

Given the nature of the work CLT does, supporting businesses to commercialise cleantech innovations, few of our activities are considered to be at high risk of slavery or human trafficking.

Beyond our Associates, who are known to the business before becoming Associates and who do not delegate work beyond themselves, CLT's supply chain is limited to IT support (email) and the supply of our London Office. Selection of these suppliers includes an assessment of the risks of people trafficking and modern slavery.

Our Policies

CLT believes the people trafficking and modern slavery are unacceptable. CLT is committed to uncovering instances of these within its supply chain and ensuring that the risk of working with suppliers or businesses involved with people trafficking or modern slavery is managed effectively.

CLT will ensure that its staff can identify the signs of people trafficking and modern slavery, carry out due diligence on suppliers and know where and how to report any concerns. Several of CLT's other policies are relevant to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. These include:

- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Health and Safety Policy
- CSR Policy
- Employee Code of Conduct
- Supplier Code of Conduct
- Associate Contract

- CLT Services Contract

Requirements of this Policy

This policy requires CLT and its employees to adhere to local and national laws in jurisdictions where CLT is operating. Failure to adhere to local and national laws will result in disciplinary action being taken against the employee.

CLT guarantees that its staff will have and should ensure, where possible, that supplier staff also have:

- Freedom to terminate their employment
- Freedom of movement
- Freedom of association
- Freedom from threats of violence
- Freedom from harassment
- Freedom from intimidation
- No worker-paid recruitment fees
- No compulsory overtime
- No child labour
- No discrimination
- No confiscation of original identification documents

CLT will ensure, where possible, that it, its staff and its suppliers will:

- Adhere to local and national laws
- Provide access to remedy, compensation and justice for victims of modern slavery

Availability of this Statement

CLT undertakes to make this policy freely available on the CLT website and to provide a copy to anyone who makes a written request for it within 30 days.

Procurement and Purchasing

CLT will consider modern slavery risks as part of its procurement and purchasing processes. This is to avoid the risk that purchasing practices unintentionally pressurises suppliers to follow poor recruitment practices and provide poor conditions and/or low pay to workers.

CLT's planning for procurement and purchasing activities will consider:

- Whether the procurement is appropriately priced so that it does not encourage aggressive pricing that does not consider sustainable production costs

- Whether realistic lead times are given to avoid the pressure of short lead times on suppliers
- Whether timescales for supply are appropriate to the scale or volume of the procurement to avoid the pressure of late high-volume orders on suppliers
- Whether the forecasts used to plan the purchase are accurate to avoid unrealistic pressures and expectations on suppliers
- Whether payments will be made on a realistic timescale and that they are not artificially extended, to avoid the pressure of late or extended payments on suppliers
- Whether the procurement is definitely going to result in a purchase ti avoid withdrawing from contracts at the last minute
- Whether penalties for not meeting orders are appropriate and are not unfair in the case of any unavoidable last-minute changes, which should be minimised or avoided if at all possible
- Whether any technical specifications are accurate to avoid the pressure of forcing changes on suppliers part way through a contract.

These elements should be considered throughout the procurement process, for example the cost of a purchase should be considered when the specification is being drawn up to ensure that the value is sufficient to cover sustainable production costs which enable the supplier (or suppliers) to pay staff appropriately; and after receipt of tenders CLT will consider whether the prices provided for goods and services are so low that the supplier (or the suppliers) are likely to be exploiting workers. Similar analyses will be undertaken for each of the issues cited above.

Due Diligence Processes

CLT undertakes due diligence when taking on new suppliers and when reviewing existing suppliers. Our due diligence activities include:

- Mapping the supply chain to assess particular product or geographical risks.
- Evaluating the modern slavery and human trafficking risks of each new supplier, including:
    - Direct elements, i.e. lack of the freedoms identified above or non-adherence to local laws, etc.
    - Indirect elements, i.e. forms of debt bondage, such as worker-paid recruitment fees, accommodations fees or healthcare fees or where private fees caused by low pay and lack of provisions (such as healthcare) lead to worker debts which traps them with an employer.
- Reviewing all aspects of our supply chain annually.
- Taking steps to improve sub-standard suppliers' practices.

Where there is a concern that people trafficking and/or modern slavery may be taking place, CLT should report the concerns to the appropriate authorities and, where appropriate, work

with the supplier to address the concerns. If, after receiving support, the supplier is not taking the issue seriously, CLT will reconsider their commercial relationship with that supplier.
Where we identify access to representation as an issue within a supply chain, we will work with the supplier(s) and workers to help them gain access to representation, this could include engagement with and education about their rights to join or form a trade union.

Steps to Assess and Manage Risks

Based on our annual review of CLT's business, we believe that the following areas of the business and supply chains include a risk of modern slavery or human trafficking taking place:
Working with businesses overseas in countries where modern slavery could be an issue – on initial engagement with each business in a location where there is a risk modern slavery or human trafficking could take place we will conduct an assessment of the business to identify whether it is happening and, if not, to what extent it is a risk in this instance. Where the risk is high, we will require the businesses to implement an antislavery policy. Annual reviews will be conducted.

Working with UK businesses working in countries where modern slavery could be an issue – beyond our initial engagement, when each business enters a location where there is a risk modern slavery or human trafficking could take place we will conduct an assessment of the business to identify whether it is happening and, if not, to what extent it is a risk in this instance. Where the risk is high, we will require the businesses to implement an antislavery policy. Annual reviews will be conducted.

We will use the Responsible Sourcing Tool (https://www.responsiblesourcingtool.org/) to help identify suppliers which may be at higher risk of modern slavery.

Key Performance Indicators

CLT will consider KPIs both in terms of their potential to lead to modern slavery and to monitor CLT's handling of modern slavery concerns.

For example, KPIs focused on increasing production or shipment "turn-around" time speed may unintentionally increase pressure on those who are producing the goods on production lines. This could create environments where modern slavery (particularly in the shape of bonded labour) may become a way a supplier or production site tries to deal with unrealistic short time pressure and related expectations on their operations or supplying partnership.

CLT has introduced additional KPIs to measure the performance of anti-slavery actions. CLT's KPIs are:

- training and capacity building of staff about modern slavery issues within six months of joining CLT, measuring changes in awareness of risk;
- number and quality of risk assessments and appropriate decision-making, followed by action within one month, if necessary;
- concerns about potential instances of modern slavery are reviewed and actioned within 10 working days;
- grievance procedures and whistle-blowing procedures followed effectively if cases are suspected or found.

Training and Communication

Within CLT staff are given training to better understand and respond to the identified slavery and human trafficking risks. The training includes:

- How to assess the risk of slavery and human trafficking
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues
- What steps CLT should take if suppliers or contractors do not implement antislavery policies in high-risk scenarios.

The training will cover the 11 indicators identified by the ILO that highlight the circumstances where forced labour may be found:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

All new staff will receive training on modern slavery and human trafficking within three months of joining the business.

In addition to the initial training ongoing communication of the policy, especially any updates or revisions to it, are critical to ensure that anti-slavery activities are embedded in CLT and its supply chains. Regular updates will be communicated to CLT staff and its supply chains, drawing

particular attention to any updates or revisions to CLT's modern slavery statement or approach to managing it.

Reporting Concerns

In the first instance concerns about suspected instances of modern slavery should be raised with the CLT CEO, Beverley Gower-Jones. This process includes:

- Prompt and victim centre response, that ensure victims are safeguarded and supported to receive justice and compensation.
- Understanding and documenting the nature of the concern and the risk of modern slavery.
- Identifying the appropriate escalation in the circumstances, e.g. directly with the supplier, or to the relevant local or national authorities. Advice can be sought from the Modern Slavery Helpline (see below).

As set out in the KPI (above), CLT will review any reported instance of a modern slavery risk or concern and respond within 10 working days. The response is likely to take one or more of the following forms:

- Safeguarding action to protect victims of modern slavery.
- Improvements agrees with supplier(s).
- Engagement and involvement of relevant local government and law enforcement agencies.
- Confirmation that the concern has not resulted in instances of modern slavery being identified.
- Explanation to the individual reporting the concern about what has been found and the action taken.

In the UK, mechanisms are in place to assist victims of slavery and human trafficking. If you identify a potential victim, they can be referred to the National Referral Mechanism to be formally identified as a victim of modern slavery and offered government-funded support. Referral for potential adult victims is by consent. government-funded support is provided through a range of specialist providers across the UK. CLT staff should start with the Modern Slavery Helpline, a UK-wide 24/7 helpline, that victims, employers and members of the public who may encounter modern slavery can call for expert support and advice on 08000 121 700.

If modern slavery is identified or suspected abroad, then the response should be tailored to the local circumstances. This will vary on a case by case basis, sometimes the most appropriate response will be to engage with local NGOs, industry bodies, trade unions or other support organisations to attempt to remedy the situation. In other cases, it will be more appropriate to contact local government and law enforcement bodies. CLT staff must always consider which approach would produce the safest outcome for the potential victims but should always

remember the economic influence and control which CLT may hold over those who may be committing these crimes.

If the local response seems inadequate and the local company seems unable to address coercion, threat, abuse and exploitation of workers, then CLT should seek to give that company more support, guidance and incentives to tackle the issue. This could include working with at-risk suppliers to provide training, messages and business incentives or guidance to implement anti-slavery policies. If this approach is ineffective then CLT should reconsider its commercial relationship with the supplier.

CLT will look to work with NGOs to support our efforts to prevent and mitigate modern slavery. The key organisations we have identified to work with are:

- Anti-Slavery Partnership
- Modern Slavery Working Group
- Decent Work in Global Supply Chains

Effectiveness in Eliminating Modern Slavery

This policy will be reviewed annually, and we will monitor all those instances where modern slavery or human trafficking has been identified as a risk. The impact of our actions will be measured to ensure the efficacy of this policy. We will also capture instances where modern slavery or human trafficking is found to improve our process for identifying situations where they are a risk.

CLT's Board has approved this policy and the Chief Executive, Beverley Gower-Jones, is responsible for implementing it and carrying out the annual policy reviews.

Signed:  Date: 3rd November 2026

Name: Beverley Gower-Jones Position: CEO