

Modern Slavery Statement

Introduction

This statement sets out Cornelius Group plc's actions to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring there is no slavery or human trafficking in its own business and supply chains.

Organisational Structure & Supply Chains

This statement covers the activities of Cornelius Group plc and its subsidiaries. Cornelius purchases raw materials for the Lifesciences and Performance Chemicals sectors from around the world, mainly from, but not limited to, the USA, China, India, and Europe.

Cornelius Group is based in the UK and its Cornelius subsidiary, Cornelius Specialties, is a manufacturing plant in the UK creating raw materials sold into the Ocular and Dental markets globally.

Responsibility

The Cornelius Board of Directors is responsible for the organisation's anti-slavery initiatives by ensuring that company policies are reviewed regularly, using the expertise of the Quality & Compliance and Human Resources teams where necessary. All new employees are informed of the company's commitment to ESG, and specifically the risks of trading with companies that have not been audited and formally approved. Our anti-slavery approach is integrated into our broader ESG strategy, ensuring social responsibility is embedded across our operations and supplier relationships.

Relevant Policies

The organisation operates the following policies which describe its approach to identifying modern slavery and the steps taken to prevent slavery and human trafficking in its operations:

Supplier Onboarding & Qualification

- All new suppliers are reviewed via this process before any promotion or transactions can take place.
- Suppliers are subject to remote (self-assessment) audits, which include confirmation of company positions on SHEQ, social, and ethical practices, including their stance on modern slavery.
- Evidence of any certification and records is requested at this stage.
- Periodic reviews of our suppliers' status, certification, and documentation are carried out. Regular review meetings are also held with the Principal and Product Management teams on general performance; any issues or changes arising are discussed and highlighted during this process.
- Cornelius works with all suppliers in our supply chains to ensure they meet the standards expected. However, any serious violations of our expected standards will lead to the termination of the business relationship.

Cornelius Group Plc

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Whistleblowing Policy

- The organisation encourages all employees, customers, and key stakeholders to report any concerns relating to the direct activities or the supply chains of the organisation.
- This includes any circumstances that may give rise to an increased risk of slavery or human trafficking.
- The organisation's Whistleblowing Policy is designed to make it easy for employees to make disclosures without fear of retaliation. The policy is located on our central intranet, providing quick access for all our employees.

Code of Conduct & Ethics Policy

- The organisation's Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation.
- Cornelius strives to maintain the highest standards of employee conduct and ethical behaviour. The policy is located on our central intranet, providing quick access for all our employees.

Training

- The organisation requires all employees to complete modern slavery awareness training and sign a training record to confirm they have read and understood the materials. The training covers:

- Human Trafficking
- Forced Labour
- Debt Bondage
- Child Labour, Child Work, and Child Slavery
- Slavery in the Supply Chain

- Key policies such as the Code of Conduct and Whistleblowing Policy are available upon request to external stakeholders to reinforce transparency and shared accountability

Key Performance Indicators

- Since the introduction of the Modern Slavery Act 2015, Cornelius has consistently reviewed its key performance indicators (KPIs) to align with this legislation. As a result, the organisation:

- Continues to develop its system for supply chain verification, evaluating any potential supplier before they enter our supply chains.
- Periodically reviews its existing supply chains, evaluating all current suppliers.
- Continues to develop internal training on this subject for all employees, building on existing knowledge and ensuring all new starters are sufficiently trained in our policies.

Cornelius continues to monitor legislative developments, including EU and global due diligence regulations, and will evolve its practices accordingly.



Board Member Approval

This statement has been approved by the organisation's Board of Directors, who commit to reviewing and updating this statement annually.

Board Member Sign off:

Name:	Mr Darren Spiby
Position:	CEO
Date:	June 2026
Signature	