



ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

11/09/2026





ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. INTRODUCTION

Dornan is committed to maintaining and promoting the highest standards of ethical conduct and integrity in all our business activities. We have a zero-tolerance approach to modern slavery and human trafficking in any form. This Anti-Slavery and Human Trafficking Statement (the “Statement”) outlines the steps Dornan has taken and continues to take to prevent modern slavery and human trafficking within our operations and supply chains. This Statement should be read in conjunction with Dornan's Anti-Slavery and Human Trafficking Policy, Code of Conduct for Business Partners, Human Rights Policy and Compliance Policy and other applicable Dornan policies.

2. OUR COMMITMENT

We categorically condemn all forms of modern slavery, including slavery, forced labour, bonded labour, child labour, and human trafficking. These practices are criminal and violate fundamental human rights. Dornan is dedicated to ensuring that all individuals are treated with dignity and respect, regardless of where we operate.

3. SCOPE AND GOVERNANCE

This Statement applies to all Dornan operations and entities under our management and control. It is binding on all directors, executives, employees, and Business Partners. We expect our suppliers, subcontractors, and partners to uphold the same high standards and comply with our Code of Conduct for Business Partners. Oversight of Dornan's modern slavery programme rests with senior management, supported by the Legal, Compliance and Data Protection Department, which is responsible for monitoring compliance, conducting due diligence activities and managing reports of suspected violations.

4. POLICIES AND DUE DILIGENCE

Dornan has implemented robust systems and controls to prevent modern slavery. These include:

- Comprehensive supplier assessments during procurement;
- Risk-based due diligence of suppliers, subcontractors and Business Partners;





- Contractual clauses prohibiting forced labour, human trafficking and other forms of modern slavery;
- Periodic reviews of supplier compliance and due diligence processes;
- Whistleblower protections for reporting concerns;
- Risk-based spot checks and audits of subcontractors and suppliers, where appropriate, to assess compliance with Dornan's ethical, labour and human rights standards;
- Investigation and remediation processes where potential concerns are identified.

5. RISK ASSESSMENT AND MITIGATION

Dornan is continually enhancing its due diligence and supply chain monitoring processes in anticipation of the EU Forced Labour Regulation, which will prohibit products made with forced labour from being placed on, made available on, or exported from the EU market.

Dornan prohibits the charging of recruitment fees to workers and expects workers to retain possession and control of their own identity, travel and work documents at all times. Any form of worker-paid recruitment fee, document retention, coercion or restriction of movement is strictly prohibited.

Dornan adopts a risk-based approach to monitoring suppliers and subcontractors. Where elevated risks are identified, additional due diligence measures, site visits, spot checks, audits or requests for supporting documentation may be undertaken to assess compliance with applicable labour, human rights and ethical standards.

6. REPORTING CONCERNS

Dornan encourages employees, suppliers, contractors and other stakeholders to report suspected instances of modern slavery, human trafficking or related human rights concerns. Reports may be made through Dornan's Protected Disclosure process or by contacting compliance@dornangroup.com. Dornan will treat all reports confidentially wherever possible and will not tolerate retaliation against any individual who raises a concern in good faith.

7. TRAINING AND AWARENESS

We promote awareness among our employees and partners to identify and report signs of modern slavery. Training and guidance are provided to ensure compliance with our policies.



DORNAN
A Turner Company

Anti-Slavery and Human Trafficking Statement

Dornan Engineering Limited its Subsidiaries and Branches
Hereafter for the purpose of this Statement known as **Dornan**

8. LEGAL AND ETHICAL FRAMEWORK

Our approach is guided by key international and regional instruments, including:

- Modern Slavery Act 2015;
- Directive 2011/36/EU;
- EU Corporate Sustainability Due Diligence Directive (CSDDD);
- Relevant Irish legislation.

9. CONTINUOUS IMPROVEMENT

Dornan is committed to continuous improvement in our efforts to combat modern slavery. We regularly review and update our policies and practices to align with evolving legal requirements and best practices. This Statement will be reviewed at least annually and updated as necessary to reflect changes in legal, regulatory and business requirements.

