

Rosebank Modern Slavery Statement

Introduction

This statement is made on behalf of the Board of Directors of Rosebank Industries plc (“Rosebank”) pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”). It sets out the steps taken to mitigate, and ultimately eliminate, the risk of modern slavery occurring within our businesses’ operations and supply chains during the year ending 31 December 2025.

Modern slavery ‘refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power’. Modern slavery is a fundamental violation of human rights and takes various forms, all of which serve to deprive a person of their liberty for another’s commercial or personal gain. These forms include, but are not limited to, compulsory labour, servitude, slavery and human trafficking.

This statement considers the activities of all Rosebank wholly-owned businesses worldwide. Rosebank and its businesses are committed to respecting all human rights and has a zero-tolerance approach to modern slavery.

Rosebank’s organisational structure, business and supply chains

Rosebank is a publicly listed company with a strategy to ‘Buy, Improve, Sell’ industrial businesses.

Industrial businesses often have large, complex supply chains and Rosebank is committed to ensuring adequate oversight and controls are in place to mitigate the risk of any form of modern slavery in its supply chain.

Responsibility for oversight of Rosebank’s modern slavery risk management is ultimately held by Rosebank’s Board of Directions. Practical application and oversight of adherence to policies is managed by the Group General Counsel and head of legal of each subsidiary business. acquired

As at 31 December 2025, Rosebank had acquired one business - Electrical Components International (“ECI”). With this, Rosebank gained over 35 manufacturing facilities in 9 countries across the globe (<https://www.ecintl.com/operations/global-locations/>), along with a large and diverse supply chain. In 2026, the company has identified two further acquisition opportunities which will expand the Groups global footprint and supply chains.

As the Group expands, Rosebank will remain focused on modern slavery risk and will continue to evolve its approach to improve mitigation of this risk.

Rosebank’s organisational policies relevant to modern slavery

Rosebank operates the following policies which describe its approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in its operations. The policies apply to Rosebank Group and all current subsidiaries. Any future businesses acquired by the Group will be expected to comply with these policies, in addition to any existing relevant policies in place:

Policy	Summary
Supply Chain Code of Conduct Policy	Our supplier code of conduct requires that suppliers and their sub-suppliers do not tolerate forced, involuntary or child labour, including slavery and human trafficking. Furthermore, it requires that workers are not threatened or subjected to harsh or inhumane treatment.
Whistleblowing Policy	Our whistleblowing policy details the controls we have in place to enable colleagues to raise concerns. To reflect Rosebank’s structure, our approach to whistleblowing includes procedures for Rosebank head office and procedures for business units. The whistleblowing procedures

	for business units, where the risk of modern slavery is greatest, allows for whistleblowing reports to be submitted 24/7, in any language and anonymously, without risk of reprisal.
Code of Ethics Policy	Our internal code of ethics policy details our zero-tolerance approach to the abuse of human rights and any form of modern slavery. Our colleagues are encouraged to use our whistleblowing avenues to report any concerns of slavery or human rights issues.
Human Rights Policy	Our human rights policy requires that all colleagues comply with local laws and has no tolerance for slavery, servitude and forced or compulsory labour. The group commits to support children's rights and to avoid any sort of child labour in its business operations. Furthermore, the group commits to take a risk-based approach in performing human rights due diligence across its operations and its business units are required to implement effective and proportionate measures to identify, assess and mitigate potential labour and human rights abuses.

Assessing and managing modern slavery risk

As an investor in industrial businesses, Rosebank has additional risk due to turnover of its portfolio and the complex supply chains of industrial companies.

We recognise the risk presented by new businesses that have not yet adopted Rosebank's approach to modern slavery risk management. Rosebank supports its business units to manage modern slavery risk. For example, Rosebank engaged with ECI to appoint a 'know your customer' (KYC) supplier.

Rosebank ensures regular reporting lines between its business units and head office, including monthly meetings between Rosebank's General Counsel and business unit equivalents, presenting regular opportunities to discuss implementation of Rosebank's compliance policies, including with respect to modern slavery, as well as any material whistleblower reports or other modern slavery related issues.

Due diligence in relation to modern slavery

As part of the acquisition onboarding process, Rosebank engages with its new businesses to understand any existing due diligence procedures with respect to modern slavery and, when not already in place, will engage with the new business to enhance supplier due diligence.

It is important that our suppliers apply the same principles of robust governance, risk management and compliance as we do. As a minimum, Rosebank expects all suppliers to comply with relevant laws and regulations and to operate in a manner consistent with Rosebank's ethical, social, and environmental commitments in line with our Supply Chain Code of Conduct.

Training

Rosebank's Group-wide training strategy is in development, but it will provide regular training on whistleblowing and modern slavery which will be compulsory for all employees.

Each new ECI employee completes training on the Code of Conduct as part of the onboarding process. It currently partners with an external training provider and has launched annual training on human rights and modern slavery issues, anti-bribery and corruption, as well as other relevant topics.

Monitoring and evaluation

Through Rosebank's governance structures and processes, modern slavery risk is constantly monitored across the group. Rosebank's General Counsel is ultimately responsible for oversight of monitoring and evaluation and is supported by heads of legal in portfolio businesses and reporting structures.

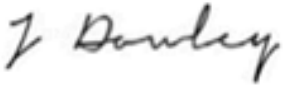
A robust whistleblowing process supports monitoring and evaluation efforts in the event of non-compliance of policies.

Further details about monitoring and evaluation processes are included in previous sections.

Approval

The above statement was reviewed and approved by the Board of Directors of Rosebank Industries plc on 17 April 2026.

For and on behalf of the Board

A handwritten signature in black ink that reads "Justin Dowley". The signature is written in a cursive, slightly slanted style.

Justin Dowley

Non-Executive Chairman, Rosebank Industries plc