

1. Opening Statement

This statement is made on a voluntary basis by **CT PYRO GROUP LTD.** Although the Company is not currently subject to the mandatory reporting requirements of Section 54 of the UK Modern Slavery Act 2015, we recognise our responsibility as a trusted supplier to major UK supermarket chains, independent retail networks and end consumers. We are committed to conducting business ethically and with integrity and to taking appropriate steps to identify, prevent and mitigate the risk of modern slavery and human trafficking within our operations and supply chains.

2. Our Business Structure & Supply Chain

CT PYRO GROUP LTD. is a UK-based importer, retailer, and wholesale distributor of consumer fireworks.

- **Manufacturing Source**

100% of our products are manufactured by specialist third-party partner factories located across China and the Far East.

- **Importation & Compliance**

Finished, retail-ready products are imported into the UK under strict international safety and customs regulations, stored securely, and distributed through approved logistics channels.

- **Downstream Markets**

We operate a multi-channel distribution model comprising:

- **B2B Wholesale:** Supply of fireworks to major UK supermarket chains and independent retail outlets for onward sale.
- **Concession Sales:** Direct sales to end users through seasonal concession sales points operated within third-party retail locations.
- **Online Sales:** Direct-to-consumer sales through our e-commerce platforms, with products supplied directly to the end user through approved distribution channels.

3. Focused Supply Chain Risk Assessment

As a supplier sourcing products from international manufacturing markets, we recognise that the primary risks associated with modern slavery are concentrated within the overseas manufacturing phase of our supply chain. Fireworks production is labour-intensive and heavily localised within specific manufacturing regions in China and the Far East. The key risks we monitor and seek to mitigate include:

- **Forced or Bonded Labour:** The potential use of migrant workers, state-imposed labour programmes, or vulnerable populations working under coercion.
- **Child Labour:** The exploitation of underage workers in manufacturing, assembly or packaging activities.
- **Unauthorised Sub-Contracting:** The risk of primary factories outsourcing production or assembly work to unregulated third-party workshops without approval.
- **Excessive Working Hours:** The potential for excessive overtime or working practices that do not meet local legal requirements.
- **Worker Welfare and Freedom of Movement:** Risks associated with restrictions on worker freedom, retention of identification documents, or unfair recruitment practices.

4. UK Operations & Direct Employment Safeguards

While our primary modern slavery risks reside within our international manufacturing supply chain, we maintain robust employment and compliance standards across our UK operations, including offices, fulfilment activities, concession sales locations and seasonal retail operations.

Our workforce comprises permanent employees alongside temporary and seasonal workers engaged during peak trading periods. To minimise the risk of labour exploitation within our UK operations, we implement the following safeguards:

- **Right to Work Verification:** Mandatory Right to Work checks are completed for all employees and temporary workers before employment commences.
- **Fair Pay Practices:** Employees are paid in accordance with applicable employment legislation and at least the prevailing National Living Wage rates where applicable.
- **Direct Payment of Wages:** Wages are paid directly into the employee's own verified bank account.
- **Agency Worker Oversight:** Where temporary labour providers are utilised, we seek to engage only reputable UK-registered agencies that operate in accordance with applicable employment legislation and ethical employment standards.

5. Due Diligence & Supply Chain Assurance

To provide confidence to our customers, retail partners and consumers, we implement a range of measures designed to identify and mitigate modern slavery risks within our supply chain, including:

- **Ethical Trading Standards:** We actively encourage and prioritise partnerships with manufacturing facilities in China and the Far East that participate in recognised ethical audit programmes such as SEDEX/SMETA or equivalent independent verification schemes.
- **Supplier Assessment:** New suppliers may be evaluated against ethical, compliance, safety and quality criteria prior to engagement.
- **Strict Anti-Outsourcing Controls:** Manufacturing partners are prohibited from sub-contracting the manufacture, labelling or packaging of our products without our prior written approval.
- **Traceability and Accountability:** Imported products are traceable back to the originating manufacturing facility, providing visibility throughout the supply chain.
- **Age Verification Safeguards:** Manufacturing partners are expected to comply with applicable minimum working age requirements and maintain appropriate employment records.
- **Ongoing Supplier Engagement:** We maintain regular communication with key manufacturing partners regarding compliance, quality and ethical trading expectations.

6. Measuring Effectiveness

To assess the effectiveness of our efforts to prevent modern slavery and human trafficking, we monitor a number of key indicators, including:

- The percentage of key manufacturing partners that have acknowledged our ethical trading expectations.
- The completion rate of Right to Work verification checks for UK-based workers.
- The number of reported modern slavery concerns or breaches identified within our operations or supply chain.
- The number of supplier compliance issues identified and addressed through corrective actions where required.

7. Whistleblowing & Reporting

We encourage employees, temporary workers, agency personnel, suppliers and business partners to raise concerns regarding any suspected instances of modern slavery, human trafficking, forced labour or unethical employment practices.

Any concerns raised will be treated seriously and investigated appropriately. Individuals reporting concerns in good faith will not be subject to retaliation as a result of raising those concerns.

We maintain open communication channels between our management team, manufacturing partners and retail customers to support the identification and escalation of any compliance concerns.

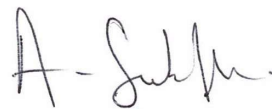
8. Continuous Improvement

CT PYRO GROUP LTD. is committed to continuously reviewing and enhancing its approach to preventing modern slavery and human trafficking. As our business develops, we will continue to evaluate our supply chain due diligence processes, supplier engagement practices and internal awareness activities to strengthen our ability to identify and mitigate potential risks.

Approval

This statement has been approved by the Board of Directors of **CT PYRO GROUP LTD.**, which has overall responsibility for overseeing the Company's approach to preventing modern slavery and human trafficking.

Signed:



Name:

Andrew Sutcliffe

Position

Director

Date:

20/10/2026