

## Competition Law Policy Statement

Hargreaves Services plc and its subsidiaries (**Hargreaves**) is a market leader in respect of the many services and products it offers. This makes it particularly important that we conduct our business at a level where our actions cannot be questioned.

The subsidiaries covered by this Policy Statement include but are not limited to: Hargreaves Industrial Services Limited; Hargreaves (UK) Limited; Blackwell Earthmoving Limited; Hargreaves (UK) Services Limited; S&B Utilities Limited; C.A Blackwell (Contracts) Limited; Hargreaves Land Limited; Hargreaves Waste Management Services Limited; Hargreaves Trading Limited; Hargreaves Services (Blindwells) Limited; Hargreaves Industrial Services (HK) Limited; Hargreaves Power Services (HK) Limited; Access Services (HK) Limited; Hargreaves Services South Africa (Pty) Limited; and Hargreaves Industrial Services Sdn Bhd.

We are firmly convinced that a fully competitive market place benefits both Hargreaves and our customers. We aim to win business in a differentiated high value manner but we do not employ unfair trading methods and we do not condone any activity which might in any way unfairly restrict the level of competition expected by our customers. We compete vigorously but fairly. Acting in full compliance with all applicable Competition laws and regulations is a fundamental part of our business.

We are committed to conducting our business with honesty and integrity, and we expect the same of all employees. Directors, Managers and others with supervisory responsibility have a duty to ensure that employees under their supervision are aware of the importance Hargreaves attaches to competition law compliance and the potential consequences of a breach of competition law for both the Company and for employees as individuals.

To ensure competition law compliance remains relevant and properly understood by all employees, the Company shall communicate this Policy Statement through:

- Competition law training programmes to key employees, depending upon job title, current responsibilities and potential risks associated with that role, as required; and
- Ongoing monitoring, review and supervision of employees.

This Policy Statement shall also be made available to stakeholders.

**Roger McDowell**  
**Chairman**  
**Hargreaves Services plc**  
**April 2026**

**Gordon Banham**  
**Chief Executive Officer**