

## GDPR POLICY

### GDPR General Data Protection Regulation

The Board of Directors and Management of Afan Group are committed to compliance with all relevant EU and Member State laws in respect of personal data and the protection of the Rights and Freedom of individuals whose information Afan Group collects and processes in accordance with the General Data Protection (GDPR). Compliance with the GDPR legislation is described by this policy and other relevant policies.

### GDPR Policy Statement

The Board of Directors will ensure that a GDPR Policy and management system are developed, maintained and implemented to ensure that personal data processing functions are compliant with the current legislation. This includes personal data from customers, clients, employee's, and suppliers also any other personal data the organisation processes from any source.

To meet these aims we will ensure that the protection of personal data is an integral part of all our business activities and continuous improvement programmes. To ensure continuing improvement and compliance, the Policy and management system processes will be reviewed on an annual basis by the designated manager.

### Employee's, Subcontractors and Suppliers

The Company expects that all employee's, partners and any third parties working with or for Afan Group , and who have or may have access to personal data, will be mandated to have read, understood and to comply with this Policy and GDPR management system and confirmed that compliance in writing.

Management and supervisory staff have the responsibility for implementing this Policy throughout the Company and must ensure that data protection considerations are always given prominence.

All Employees, and certain external parties, will receive or be expected to provide evidence of appropriate training. The Consequences of breaching the GDPR Policy are set out in Afan Group disciplinary policy and in contracts of agreements with third parties.

No third party may access personal data held by Afan Group without having first entered into a data confidentiality agreement which imposes on the third- party obligations no less onerous than those to which Afan Group is committed. This agreement gives Afan Group the right to audit for compliance with legislation. Any breach of the GDPR will be dealt with under the company disciplinary processes and may also be a criminal offence, in which case the matter will be reported as soon as possible to the appropriate authorities.

### Governance

The responsibility for determining the Company's policies on General Data Protection Regulations, including revision of this Policy, lies with the Directors of Afan Group . The management and staff of the company will monitor the operation of this Policy with the Board of Directors receiving regular reports. By the appointment of a competent person with responsibility for Data Protection, the Company will ensure support for the management team, staff and clients in data protection matters.

Signed:  
Andrew Williams  
Managing Director  
Date: January2026

