

Modern Slavery and Human Trafficking Statement

For the financial year ending: April 2027

Organisation: Kempston Group Holdings Limited

1. Introduction

Kempston Group Holdings Ltd is committed to acting ethically and with integrity in all business dealings and relationships. We have a zero-tolerance approach to modern slavery and human trafficking and are committed to implementing and enforcing effective systems and controls to help ensure that modern slavery is not taking place within our own operations or supply chains.

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Kempston Group Holdings Limited during the financial year ending April 2027 to prevent modern slavery and human trafficking in our business and supply chains.

2. Our Business and Supply Chains

Kempston Group Holdings Limited Ltd supplies goods and services through its own business operations and through a network of suppliers, contractors and service providers. This statement applies to Kempston Group Holdings Limited Ltd and, where relevant, to group businesses and operations trading in the United Kingdom, Ireland, Dubai and Singapore. Our supply chains may include product manufacturers, distributors, logistics providers, warehousing, facilities management, labour providers, professional services, technology providers and other support services.

We recognise that modern slavery risks may be higher where there are long or complex supply chains, use of temporary or agency labour, low-skilled or low-paid work, subcontracting, migrant labour, recruitment fees, limited visibility below tier-one suppliers or operations in sectors or locations with weaker labour protections.

For group operations trading in Ireland, we recognise the relevance of Irish legislation and guidance relating to human trafficking, forced labour and labour exploitation, including the Criminal Law (Human Trafficking) Act 2008, as amended, and wider EU developments on corporate sustainability reporting, human rights due diligence and forced labour. Our Irish operations are expected to follow the same zero-tolerance standards set out in this statement, while also complying with applicable local employment, labour, immigration, health and safety, and procurement requirements.

For group operations trading in Dubai and the wider United Arab Emirates, we recognise the importance of the UAE's legal framework prohibiting human trafficking and forced labour, including Federal Decree-Law No. 24 of 2023 on Combating Human Trafficking. Our Dubai operations are expected to comply with applicable local labour, immigration, recruitment, wage payment and worker welfare requirements, and to remain alert to indicators of exploitation such as retention of identity documents, recruitment fees, wage withholding, excessive overtime, restrictions on movement or poor accommodation standards.

For group operations trading in Singapore, we recognise the relevance of Singapore's legal framework prohibiting human trafficking, forced labour and exploitation, including the Prevention of Human Trafficking Act 2014 and related employment, immigration and workplace legislation. Our Singapore operations are expected to follow the same zero-tolerance standards set out in this statement, while

complying with applicable local requirements relating to employment practices, work pass conditions, recruitment, wages, working hours, accommodation where relevant, and worker welfare. We remain alert to indicators of exploitation including recruitment fees, wage withholding, retention of identity documents, excessive working hours, restrictions on movement or dependency on third-party labour providers.

3. Our Policies and Governance

Our Modern Slavery Policy sets out our expectations for employees, directors, officers, agency workers, contractors, consultants, suppliers, customers, business partners and other third parties working for or on behalf of the Company. The policy confirms our zero-tolerance approach and explains how concerns should be reported and managed.

The Board of Directors has overall responsibility for ensuring that our approach to modern slavery complies with our legal and ethical obligations. Management has day-to-day responsibility for implementing the policy, monitoring its use and effectiveness, dealing with queries, and auditing internal controls and procedures designed to counter modern slavery risks.

Our approach is supported by related procedures and controls, including recruitment and right to work processes, supplier onboarding and procurement controls, contractual requirements, grievance routes and whistleblowing arrangements.

4. Risk Assessment

We take a risk-based approach to identifying, assessing and managing modern slavery risks within our operations and supply chains. This includes considering supplier locations, sectors, products or services, labour arrangements, subcontracting practices, recruitment methods and any known indicators of forced labour, human trafficking or exploitation.

We aim to improve visibility of our supply chains over time and prioritise action where risk is assessed to be higher. Where concerns or indicators are identified, we seek to understand the circumstances, protect affected individuals from further harm and take proportionate remedial action.

5. Due Diligence and Supplier Management

Our due diligence activities include supplier onboarding checks, supplier questionnaires, contractual commitments, review of supplier modern slavery statements or relevant policies, audits or site visits where appropriate, corrective action plans, and escalation or termination where concerns are not adequately addressed.

Managers responsible for procurement of goods or services are expected to communicate our zero-tolerance approach to relevant third parties during the procurement process and at the outset of business relationships. Relevant third-party contracts should include appropriate obligations to comply with applicable modern slavery legislation and prohibit forced, compulsory or trafficked labour, or anyone held in slavery or servitude.

Where suppliers, contractors or labour providers support our Ireland, Dubai or Singapore operations, managers should consider whether any additional local due diligence is required, particularly where migrant labour, third-party recruitment, subcontracting, accommodation, transport or lower-paid roles

are involved. This may include checking compliance with local employment and immigration rules, confirming that workers are not charged unlawful recruitment fees, and requiring suppliers to cooperate with any reasonable enquiries or corrective actions.

We will not knowingly continue to work with any organisation that refuses to address credible concerns or fails to take appropriate corrective action.

6. Training and Communication

We provide appropriate communication and training on modern slavery risks and our policy. Training is proportionate to role and risk and may include how to identify warning signs, how to report concerns, procurement responsibilities, supplier due diligence and our zero-tolerance expectations.

We also continue the work to communicate our expectations to relevant suppliers, contractors and business partners at the outset of the relationship and, where appropriate, during ongoing supplier management activity.

7. Reporting Concerns and Whistleblowing

Any person who knows or suspects that modern slavery may be occurring within our business, supply chains or any third-party relationship is encouraged to report the concern as soon as possible.

Concerns may be raised with a line manager, the HR Manager, the Managing Director or through the Company's Whistleblowing Procedure where appropriate.

If there is an immediate risk of serious harm, emergency services should be contacted. Reports will be handled sensitively, and we seek to protect those who raise concerns in good faith from retaliation or detrimental treatment.

8. Monitoring Effectiveness

We monitor the effectiveness of our approach to preventing modern slavery and review our Modern Slavery Policy at least annually or sooner where there are significant legal, operational or supply chain changes.

Measures of effectiveness may include completion of training, number and outcome of concerns raised, supplier due diligence completion, supplier corrective actions, policy communication, audit outcomes and progress against identified improvement actions.

9. Actions Taken During the Reporting Year

During the financial year ending April 2026 we have continued to maintain and communicate our Modern Slavery Policy, reinforce our zero-tolerance approach, and review the controls in place to identify, manage and escalate modern slavery risks within our operations and supply chains.

We have also continued to promote reporting routes for concerns, maintain appropriate supplier expectations, and review our policy wording to ensure it remains clear, current and aligned with our legal and ethical obligations.

10. Planned Next Steps

Over the next reporting period, we will continue to strengthen our approach to modern slavery prevention. Planned actions may include reviewing supplier onboarding questions, reviewing and

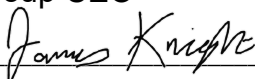
implementing further risk assessments, improving visibility of higher-risk suppliers, refreshing employee and manager communication, reviewing contractual wording and continuing to monitor relevant policy and legislative developments.

11. Approval

This statement has been approved by the Board of Directors of Kempston Group Holdings Limited Ltd and is signed on its behalf by:

Name: James Knight

Position: Group CEO

Signature:  _____

Date: 16 / 07 / 2026