



2025 Modern Slavery Statement

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the actions ITS Technology Group Limited (“ITS”) has taken to understand and prevent all potential modern slavery risks related to its business operations and supply chains.

This statement relates to actions and activities during the financial year 1 January 2025 to 31 December 2025.

ITS has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings.

Organisational structure and supply chains

ITS is a UK-based telecommunications provider specialising in the design, build, and operation of full-fibre connectivity infrastructure and related services. We operate across the UK with our main office in Warrington, Cheshire, and additional regional offices.

ITS’s supply chains primarily include civil engineering and construction contractors (including street works and ducting), fibre installation subcontractors, IT and network equipment suppliers, other telecom service providers and professional service providers.

The majority of our suppliers operate within the UK, although certain equipment suppliers may operate internationally.

Risk assessment and management

Based on our current operations, ITS does not consider its core business activities to be high risk in relation to modern slavery. Our operations are primarily UK-based and delivered through established contractors operating within regulated environments.

However, ITS recognises that potential risks could arise within:

- Use of subcontracted labour in network build and civil engineering works;
- Reliance on temporary or agency workers;
- Complex subcontracting chains in infrastructure delivery; and
- Procurement of equipment from overseas manufacturers.

Where relevant, we mitigate these risks by:

- Maintaining transparency and oversight within supplier relationships;
- Escalating concerns promptly if identified.

Due diligence

ITS undertakes due diligence when onboarding and reviewing suppliers, including:

- Incorporating contractual obligations requiring compliance with the Modern Slavery Act 2015;
- Requiring suppliers to maintain registers of accreditation of their workers;
- Carrying out risk-based supplier audits (where appropriate);
- Monitoring supplier performance and compliance; and
- Reserving the right to terminate relationships for non-compliance.

We are committed to ensuring that ITS suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their workers' working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

Measuring effectiveness

We assess the effectiveness of our approach to preventing modern slavery by:

- Monitoring supplier relationships and performance;
- Reviewing any reported concerns or incidents;
- Evaluating our policies and processes periodically to ensure they remain appropriate and effective; and
- Monitoring training completion rates.

To date, we are not aware of any incidents of modern slavery within our business or supply chains.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- Senior Leadership Team – overall accountability;
- People Team – policy development and training;
- Teams with supply chain management – supplier due diligence and monitoring; and
- Senior Management – implementation and oversight.

Relevant policies and commitments

The following policies and commitments describe our approach to the identification and prevention of slavery and human trafficking in our operations at ITS. Policies are reviewed and updated annually:

- **Anti-Slavery policy:** our Anti-Slavery and Human Trafficking policy sets out our zero-tolerance commitment to preventing modern slavery and human trafficking across

our business and supply chains, requiring all employees, contractors, and suppliers to act ethically, report concerns promptly, and uphold strict prohibitions against forced or exploited labour. It emphasises transparency, shared responsibility, early reporting, and strong protection for anyone who raises concerns in good faith, while also supporting suppliers to improve labour practices where needed. This policy also provides third party contact details for 'Unseen', the UK's leading anti-slavery organisation, so that employees can make contact directly if they have any concerns about modern slavery within our organisation or across our supply chains.

- **Whistleblowing policy:** our policy encourages all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Reports of concern can be raised confidentially to our designated Whistleblowing Officer. Our policy also takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.
- **ESG policy:** we demonstrate a commitment to preventing modern slavery through our broader Environmental, Social, and Governance (ESG) framework. This includes an explicit commitment to respect human rights across our operations and supply chain, alongside a focus on maintaining a responsible and ethical supply chain by holding suppliers to high ESG standards.
- **Recruitment process:** we are committed to ensuring that modern slavery and human trafficking have no place in our recruitment practices, and we recruit employees directly wherever possible. Where recruitment agencies are used to support candidate sourcing, ITS retains responsibility for candidate assessment, interviewing, verification of identity and right to work checks, and the decision to make any offer of employment. Our recruitment processes are designed to mitigate the risk of modern slavery and human trafficking and ensure transparency, fairness, and compliance with all applicable employment laws. All individuals are provided with clear and accurate information about their roles, terms, and conditions of employment. We remain vigilant to indicators of potential exploitation throughout the recruitment and onboarding process.
- **Fair pay:** earlier this year, ITS achieved 'Accredited Level' status under the Liverpool City Region Fair Employment Charter, reflecting our commitment to ethical employment practices and the prevention of exploitation within our operations and supply chain. Compliance with the Charter requires us to uphold fair pay, fair working hours and transparent employment conditions for all colleagues, which directly supports our efforts to minimise the risk of modern slavery breaches. As part of this commitment, we ensure that all employees are paid the Real Living Wage or above. We also work proactively with our defined contractors to identify and implement achievable steps toward extending Real Living Wage coverage across their workforce. Providing fair,

competitive pay to all individuals - regardless of role, level or location - forms a core element of our approach to safeguarding workers, promoting decent standards of living, and reducing vulnerability to exploitation.

- **Training:**

In 2026, ITS will provide online training on modern slavery to all employees. This training will include:

- Definitions of modern slavery and the various forms recognised under UK legislation and guidance.
- Identification of signs and indicators of modern slavery, including recognition of victims and individuals vulnerable to exploitation.
- Guidance on reporting concerns, suspicions or disclosures related to modern slavery.
- Understanding of legal and organisational responsibilities under the Modern Slavery Act 2015, including compliance requirements and duties.
- Actions that individuals and organisations can take to help prevent and eliminate modern slavery in the UK.
- Promotion of awareness, vigilance and ethical practices to support ITS's commitment to combat modern slavery.

Commitment

ITS is committed to continuous improvement in managing ethical risks within our business and supply chains.

A copy of this Modern Slavery Statement will be published on the ITS website with a prominent link on the homepage.

Approval

This statement was approved on 22 June 2026 by the ITS Board.



Signed on 22 June 2026 by Daren Baythorpe, CEO