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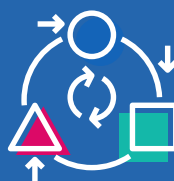
Reimagining IT Through AI

Modern Slavery Policy

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Revision history

VERSION	DATE	REVISION AUTHOR	SUMMARY OF CHANGES
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Approval

NAME	POSITION	DATE
Ian Turfrey	CEO	08/10/2021
Nick Klee	COO	12/10/2021
Ian Turfrey	CCO	12/01/2026

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1 Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

The Company has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or any of our supply chains.

We are also committed to ensuring transparency in our own business and our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from our contractors, suppliers and other business partners. As part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children, in the coming year. We expect our suppliers to hold their suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's employment contract, and we may amend it at any time.

2 Responsibility for the Policy

The Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.

The Company has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they effectively counter modern slavery.

Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved.

Comments, suggestions and queries are encouraged and should be addressed to the CEO, COO or CTO.

3 Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You must avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. Suppose you believe or suspect a breach of this policy has occurred or that it may occur. In that case, you must notify your line manager or company Director OR report it by our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will support and guide our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

We aim to encourage openness and support anyone who raises genuine concerns in good faith under this policy, even if they are mistaken. We are committed to ensuring no one suffers any detrimental treatment due to reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.

4 Communication & Awareness of this Policy

Training on this policy and the risk our business faces from modern slavery in its supply chains forms part of the induction process for all individuals who work for us. Updates will be provided using established methods of communication between the business and you. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship and reinforced as appropriate.

5 Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, resulting in dismissal for misconduct or gross misconduct. If they breach this policy, we may terminate our relationship with other individuals and organisations working on our behalf.

6 Our Modern Slavery & Human Trafficking Statement

The rest of this overarching policy document is for internal company use; the following section is our public statement regarding modern slavery & human trafficking. The following statement will be published on our website and may be made available to any member of the public using any means:

6.1 Modern Slavery & Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

TTG has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically and with integrity in all our business relationships. This statement is made pursuant to section 54 of the Modern Slavery Act 2015.

Our policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, associates and suppliers.

6.2 Commitments

Technology Transformation Group Limited is a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and supply chains
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain
- TTG strictly prohibits the use of modern slavery and human trafficking in our operations and supply chains. We maintain internal policies and controls designed to support this commitment, including a Modern Slavery Policy and Code of Conduct, whistleblowing arrangements to enable concerns to be raised confidentially and without retaliation, recruitment and right-to-work controls and supplier expectations that require compliance with applicable laws and fair labour practices. We take a risk-based approach to our contracting and supplier management processes and keep them under review. Where appropriate, we include contractual requirements for suppliers and subcontractors to comply with anti-slavery and human trafficking laws, maintain adequate policies and controls and notify TTG of any suspected or confirmed modern slavery concerns within their operations or supply chains. We may require

employment and recruitment agencies and other third parties supplying workers to confirm their compliance with our Modern Slavery Policy and relevant legal obligations

- The prevention, detection and reporting of modern slavery is the responsibility of everyone working for TTG or on our behalf. TTG provides training and guidance proportionate to role, particularly for staff involved in procurement, supplier management, recruitment and contract management. Training and communications cover modern slavery awareness, common warning signs (for example, coercion, withheld identity documents, unfair deductions, intimidation or restricted freedom), and clear internal escalation routes, including confidential reporting via whistleblowing arrangements. We refresh awareness periodically and reinforce expectations through onboarding and internal communications
- TTG monitors the effectiveness of our approach and seeks to continuously improve it. We use practical performance indicators appropriate to the nature and size of our business, which may include the proportion of higher-risk suppliers and subcontractors reviewed against modern slavery criteria, the proportion of relevant supplier agreements including appropriate anti-slavery wording, completion of modern slavery awareness training by staff in relevant roles, and the number of concerns raised, investigated and resolved. During the reporting period, TTG recorded no known or confirmed incidents of modern slavery within our business operations. Where supplier engagement identifies opportunities to strengthen assurance (for example, policy availability or evidence), we seek clarification and improvement as part of supplier management

Consistent with our risk-based approach, we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Modern Slavery Policy. Suppliers engage workers through a third party to obtain that third party's agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Modern Slavery Policy
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach or terminating such relationships