Modern Slavery Act – Annual Statement

The Modern Slavery Act came into force on 29th October 2015 and places an obligation on QTS to publish an annual statement on the activities that QTS perform to eliminate modern slavery in our business and supply chains. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the activities undertaken by QTS in respect of the prevention of modern slavery and human trafficking and constitutes the company's annual statement for the financial period 1st October 2024 to 30th September 2025.

QTS Group provides specialist construction, engineering and vegetation control services in support of the creation and maintenance of assets for both public and private infrastructure sector customers. Work is conducted within the United Kingdom by a directly employed and contracted workforce all of whom are fully eligible to work within the United Kingdom.

Modern Slavery is a criminal offence, it can occur in various forms, including servitude, forced or compulsory labour and human trafficking. All of these deprive a person of their liberty by exploiting them for personnel or commercial gain.

QTS have a zero tolerance approach to modern slavery and are committed to acting ethically and with integrity to ensure that there is no slavery or human trafficking within the business and our supply chains.

We carry out a robust system for supplier approval and monitoring. Suppliers will fail to be approved or will be disqualified and removed from the approved suppliers list for failure to fulfil the fundamental human rights of their workers, or if found to employ minors, or to have slavery or human trafficking taking place within their organisations. We ensure transparency within the organisation and with suppliers of goods and services to the organisation.

All suppliers are required to complete a compliance questionnaire confirming adherence to the Modern Slavery Act 2015, fundamental human rights, and the absence of forced labour or human trafficking within their operations and supply chains. Suppliers sourcing from high-risk countries must provide evidence of annual third-party audits.

Audits are conducted at onboarding and periodically, with a focus on high- and medium-risk suppliers. These audits may include site visits, document reviews, and interviews with workers to verify legal working contracts, wage compliance, working hours, and employment conditions. Unannounced audits are carried out where appropriate to ensure transparency and detect hidden risks.

Audits assess:

- Compliance with local and national laws
- Legal working contracts and wage documentation
- Absence of child labour (no workers under 16)
- Timely payment of wages
- No withholding of passports or identity documents
- No physical or verbal abuse
- Appropriate HR policies and grievance mechanisms
- Fair treatment of temporary workers

We regularly map our supply chain to identify and assess risks, especially in regions or sectors with higher vulnerability to modern slavery. This mapping is updated

annually and whenever significant changes occur in supplier status or sourcing locations.

For suppliers in high-risk regions, we require independent third-party audits and certifications. Evidence of these audits must be provided annually and reviewed by our compliance team.

Audit findings are used to drive corrective actions, supplier education, and process improvements. Suppliers failing to meet our standards are removed from the approved list, and we engage with industry bodies to stay current on best practices and evolving risks.

All audit outcomes are documented, and significant findings are reported to senior management. Our annual statement includes a summary of audit activities and key outcomes, demonstrating our commitment to transparency and continuous improvement.

As a minimum, with the exception of apprenticeship schemes, all of our employees will be paid the National minimum wage in line with age and responsibilities, we will endeavour to ensure that this is carried through to our supply chain.

Pre-employment checks are carried out for all employees to reduce the risk of QTS directly employing individuals that could fall within the scope of modern slavery and also to ensure that they have a right to work within the United Kingdom. All staff have received awareness training and those involved in the engagement and induction of workers, and those dealing with our supply chain matters have, or will, receive appropriate levels of additional training in these issues.

To ensure QTS is compliant with the act we carry out due diligence within the organisation and within our supply chain. We have an internal compliance department that carry out and continually monitor routine checks and audits to ensure that our processes are effective and in full compliance with the act.

QTS business activities during 2024/25 included:

- Continued review of processes and procedures to ensure that modern slavery and human trafficking is not taking place within the supply chain.
- Introduction of an Ethical Procurement Policy
- Initiatives including employee Modern Slavery awareness training, improved supplier reviews and assessment and improved audit processes.
- Incorporation of Modern Slavery requirements into new and existing supplier review processes.
- Key personnel undertaking the CIPS Ethics Course which provides vital up to date information on modern slavery and areas of concern and risk.
- Following our 2024-25 Audit Programme, no evidence of Modern Slavery has been found in the supply chain.

QTS business objectives for the financial year 2025/26 include:

- Continuing to monitor suppliers using a range of initiatives across our business including the monitoring of suppliers to cover both high and medium risk suppliers and looking at the supply chain to evidence their commitment to the prevention of Modern Slavery.
- Undertaking further supply chain reviews to ensure that any potential new or existing suppliers have not changed their status in terms of “risk”.

- Continuing to engage with key strategic suppliers and industry bodies across the markets in which they operate to better understand capability, best practice and learning on Modern Slavery to continuously improve our approach to Modern Slavery.
- Use our position through the approved supplier process to educate and inform our supply chain on the identifying the signs and prevention of Modern Slavery.

QTS Group is committed to fostering a culture of transparency and integrity, where all employees, suppliers, and stakeholders feel empowered to report concerns about modern slavery, human trafficking, or unethical practices without fear of reprisal.

Reporting Channels:

Concerns or suspicions regarding modern slavery can be reported confidentially to our Compliance Department via email at jamielewis@qtsgroup.com or by calling 0800 0121 700. Reports may also be made through the government's online portal at https://www.gov.uk/report-modern-slavery

This statement will be subject to annual review and has been approved by the QTS Group Ltd board.

This policy has been endorsed by the QTS Group's Managing Director, Andrew Steel, on the 31st October 2025 and is reviewed and developed on an annual basis.

A signed copy is retained at Head Office.