

GBM Group of Companies : Anti-Slavery Statement for year ended 31st December 2024

1. Introduction

GBM Digital Technologies Group Holdings Limited ("GBM") is committed to preventing acts of Modern Slavery and Human Trafficking from occurring within its group business and supply chain and imposes the same high standards on its suppliers. GBM provides this public statement on behalf of the GBM group (as defined below) in accordance with section 54 of the Modern Slavery Act 2015 ("MSA").

During 2024 GBM continued to prioritise our approach to ethical processes and partnering responsibly to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. GBM was acquired XMA Holdings Limited ("XHL") and are working to XHL Group business practices and quality standards. We are committed to improving our practices to combat slavery and human trafficking in our business and supply chain.

"GBM takes its Anti-slavery and Human Trafficking requirements extremely seriously and is wholly committed to eliminating such practices from our supply chain.

We are continuously improving our practices to ensure full compliance with our legal and social responsibility and as the Group grows, Corporate Governance is key to the successful growth of the business"

Antony Taylor – Chief Financial Officer

2. Structure of the organisation

GBM is the parent management company to the GBM Group of companies. GBM is a company incorporated in England and Wales (registered number 14306747) and its registered office is at Unit 2.3-2.4, Arbetha Northampton Road, Manchester, England, M40 5BP. In 2024, the GBM Group of companies was acquired by XMA Holdings Limited ("XHL"). XHL is a company incorporated in England and Wales (registered number 13166183) and its registered office is at Wilford Industrial Estate Ruddington lane Wilford Nottingham NG11 7EP.

3. Business of GBM and its supply chains

GBM is the active trading company of XHL that includes GBM Digital Technologies Limited trading as Sync and Kingsfield Computer Products Limited. As of June 2025, GBM employed 75 people across business operations in the UK. GBM is a value added reseller of IT products and services working with a range of suppliers, almost all of which are global manufacturers such as Apple, Microsoft, HP and Lenovo and leading vendors and system integrators (SIs) to deliver agile and flexible solutions, supported by best-in-class technologies. (Websites at <https://www.wearesync.co.uk/about-us/> and <https://www.kingsfieldit.com/>)

A copy of this statement will be placed on all company websites in the GBM Group.

4. GBM Group Policy on slavery and human trafficking

Slavery and human trafficking are illegal and a violation of human rights. There are many forms of modern slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain. The GBM Group has a zero tolerance approach to modern slavery and human trafficking; we are committed to acting ethically, and with integrity in all our business dealings and have appropriate policies in place that reflects our commitment to acting with integrity in all our business relationships.

The GBM Group expects suppliers and other business partners to uphold high standards in their business practices.

**GBM Digital Technologies
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M12 6LB

5. Practices of the GBM Group

As part of the GBM Group's commitment to combating modern slavery, we have the following practices within GBM:

- Produce a Group Supplier Code of Conduct (the "Code") which includes provisions on slavery and human trafficking and ensure our suppliers adhere to the principles of this Code as a minimum standard.
- Our standard supplier agreement (which we ask new partners to sign) contains specific anti-slavery provisions and confirms adherence to our Code.
- We ensure our suppliers are aware of our practices and policies and adhere to the same high standards.
- We annually submit our Group Statement to the Transparency in Supply Chains ('TISC') Report, an open data modern slavery statement register to support the UK in fighting modern slavery.

6. Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains.

We internally map and monitor our supply chain through specialised software tools to identify which suppliers demonstrate the highest potential risk of slavery and human trafficking.

- monitor potential risk areas in our business and supply chains.

Through appropriate safeguarding plans and processes, with regular monitoring of relevant/vulnerable groups to reduce the risk of slavery and human trafficking occurring in our business.

- mitigate our potential for risk.

Our code sets out that both ourselves and our supply chain must categorically not employ child workers. Our internal recruitment policy is based on procedures that focus on compliance with all applicable legislation ensuring the right to work, validity of documents and work permits for foreign workers. Our recruitment process outsourcing (RPO) is centralised and governed through our HR team who work to our standard process of ensuring that all legislation is adhered to.

- provide adequate protection for whistle-blowers.

We have policies and procedures in place to enable our employees to whistle blow and have safeguards in place should the need arise for them to do so. GBM operate the mechanism contained in our Whistleblowing Policy of:

- (i) an employee reporting in confidence to their immediate supervisor or if that is not possible to do so, to report to Scott Bordonni (the "Whistleblowing Officer");
- (ii) the Whistleblowing Reporting Form available on the Company intranet which can be emailed directly to the Whistleblowing Officer or posted anonymously;
- (iii) the ability for anybody to make an anonymous report in writing posted to the Whistleblowing Officer; and
- (iv) providing adequate protection for whistle-blowers on all matters including reporting cases of coercion or forced labour, through our 'Whistleblowing Officer'. Any report submitted via whatever method will always be handled promptly and confidentially.

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7. Risk and compliance

The GBM Group holds regular compliance meetings with senior stakeholders to discuss any new legislation, horizon scanning, concerns and best practice. Our Modern Slavery Statements and best practice remain on the agenda. Attendance at these meetings require a senior representative from each department to ensure a unified approach and to learn from the wider experience of Departments in the GBM Group.

We regularly evaluate through our supplier platform the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain by monitoring any anti-slavery policy changes to high value suppliers to ensure any changes are assessed for potential risk or compliance failure.

We do not consider that GBM directly operates in high-risk sectors or locations as most slavery and trafficking occurs within clothing and fashion (ready-made garments) and agricultural products or source raw materials from countries with high modern slavery risk.

Where we have identified a potential risk, these can be investigated, remediated and mitigated through activities such as due diligence, improved procurement practices or industry collaboration.

We ensure all our suppliers adhere to the principles of our Code. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains.

We elect department representatives who demonstrate our approach to identifying and eradicating modern slavery within our business in the processes that we take and our risk-based approach to both internal and external contextual factors.

These include:

1. Our Compliance team assesses the risk levels of modern slavery occurring in our chosen partner sector/country supply chain for every Partner annually.
2. Our Compliance Manager conducts audits on whether our partners have poor working practices.
3. Our commercial teams investigate the type of workforce our partners employ and have in place an onboarding process that includes the flow down of ours and our end users' terms.
4. Our HR Department reviews and analyses headcount, monitoring the type of workforce we are employing and what our policy is on temporary workers.
5. Our CPO reviews the pay scales we employ.
6. Our HR, Compliance and Training Departments manage the equality processes we have in place.
7. Our HR department sets out stringent guidelines for any unpaid roles limited to pre agreed, short term work experience for individuals aged 17 and under recommendation via a school and/or college only.

8. Training and Further Actions

The GBM Group has established a high level training program focused on the MSA, developed for inclusion within our Learning Management System Thinkific, which was made compulsory for all current employees and permanently accessible by any employees for ongoing training.

We continue to review and improve on existing measures and take additional steps to combat slavery and educate our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. We encourage employees to identify and report potential breaches. Our Learning Management System provides an audit of all staff that have completed the training and flags those that are overdue for management to enforce completion.

9: Sign-off

This statement is made in accordance with section 54(1) of the MSA and constitutes GBM's Anti-Slavery and Human Trafficking statement for the financial year ending **31st December 2024.**

GBM Executive Board have approved this statement with final approval from the Board on 25th June 2025.

Signed by



Kelvin Lee
Director for and on behalf of XHL and GBM Group

Date: 25th June 2025

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