

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Telent Technology Services Limited

Financial Year: 1 April 2025 to 31 March 2026

Introduction

This statement sets out the steps taken by Telent Technology Services Limited (“**Telent**”) to prevent modern slavery and human trafficking in our business and supply chains during the financial year 1 April 2025 to 31 March 2026. We recognise our responsibility to take a robust, transparent and proactive approach in identifying and addressing risks related to modern slavery.

We are fully committed to ensuring that slavery and human trafficking have no place in our operations or supply chains. Our efforts include maintaining proportionate due diligence processes, engaging with suppliers to promote ethical standards, and providing training to employees to raise awareness of these issues.

Business and Supply Chain Structure

Telent is a UK-based technology services provider, delivering mission-critical digital infrastructure and network services across the telecommunications, transport, utility, and public safety sectors. We are a subsidiary of M Group (Services) Limited in its Technology and Communications division. Telent employs approximately 2,782 people across the UK and Ireland. Our revenue for the reporting period was approximately £471.4m. Our business operates through two key divisions:

Network & Infrastructure Services	Delivering design, installation, integration, and support for digital infrastructure and communication networks
Transport	Providing design, installation, and management of digital infrastructure for rail, metro and highways

You can read more about on our website at www.telent.com.

In the year, we transacted with approximately 1,100 suppliers, with 96% of procurement spend occurring within the UK. As part of our service delivery, we source a range of products and services including:

- Low to high-value equipment and commodities
- Contingent labour across diverse skill sets
- Short and long-term service contracts including contracted engineering and technical services

Most of our procurement is through formal contracts with long-term suppliers of commercial off-the-shelf (COTS) products and services. Our sustainability and social value strategy promotes fair share, payment, and terms to help prevent exploitative practices and reduce the risk of modern slavery and labour abuse in our supply chain.

However, we recognise that despite a predominantly UK-based supply chain, there remains inherent risk within the extended and often complex global supply chains of technology equipment and components.

Organisational Policies

Our policies reflect a zero-tolerance approach to modern slavery and support our commitment to ethical business practices. These include:

Policy	Summary
Anti-Slavery Policy	Sets out our zero-tolerance approach and procedures for addressing suspected incidents, including remediation actions.
Supplier Ethical Code of Conduct	Aligned with the ETI Base Code and ILO Labour Conventions; outlines labour standards, ethical expectations, and sustainability commitments for our suppliers
How to Get Paid Guide	Promotes timely, fair payment to suppliers to reduce financial exploitation risks.
Whistleblowing Policy	Provides a confidential mechanism for employees and suppliers to report concerns, including modern slavery.

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Policies are communicated through supplier onboarding, published on our website, and embedded into supplier contracts. Non-compliance may result in remedial action or contract termination.

Assessing and Managing Risk

We routinely assess modern slavery risk based on geography, industry, labour practices, and supplier relationships. Areas considered higher risk include:

- Overseas suppliers (outside of UK and Ireland), particularly those in regions with weak labour protections
- Labour providers and recruitment agencies where service delivery may rely on a significant proportion of unskilled or low-skilled labour. This refers to typically manual jobs or tasks that can be performed by most people without specific training, technical competencies, or education
- Extended technology supply chains (e.g. supplier component sourcing)

Our approach includes engagement with suppliers, internal stakeholders, and policy reviews to ensure risks are appropriately identified and managed.

Due Diligence Processes

We have implemented robust due diligence processes to prevent and detect modern slavery risks:

- Supplier pre-qualification includes detailed assessment of modern slavery policies, statements, codes of conduct and ongoing commitment to continuous improvement
- Ensuring all right to work processes are being adhered to internally
- Regular supplier assurance audits (remote and on-site) by our Procurement & Supplier Assurance Teams
- A clear incident response process, including remediation plans and follow-up
- Encouraging all Telent stakeholders to speak up about any concerns
- Processes to support suppliers to implement corrective action plans, while reserving the right to terminate business relationships if violations are not resolved in the agreed timeframe
- Bi-annual review of any material change in risk and performance against KPI's, audit regimes and new developments across our supply chain reported at board level

Supplier Audit Schedule

We ensure that suppliers identified as presenting a higher risk of modern slavery have either published a modern slavery statement or provided written confirmation of compliance with our Anti-Slavery Policy. In addition, we verify that all large suppliers falling within the scope of the Modern Slavery Act 2015 have published a compliant statement.

Type	Frequency	Details
All suppliers	Onboarding	• Prequalification evaluation and risk assessment including background check through third party risk management platform • Must have published a modern slavery statement or provided written confirmation of compliance with our policies
Large businesses	Annually	• Suppliers with an annual turnover above £36 million are required to provide a current modern slavery statement in accordance with the Modern Slavery Act 2015
Infrastructure services suppliers	Annually	• Annual supervisory checks and quality assessments across all regions
Higher risk suppliers (unskilled labour and overseas)	1-3 years	• Compliance must be refreshed at least every three years or in line with our regular quality assurance audit cycle, whichever occurs first

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Grievance and Remediation

Telent promotes transparency and actively encourages all stakeholders including suppliers and their employees to speak up and inform us of any actual or suspected malpractice. We provide access to “Navex”, an anonymous third-party reporting mechanism to which encourages individuals to speak up without fear of reprisal and provides a formal approach to remediation.

Our remediation process ensures swift and effective action to safeguard human rights and fulfil legal obligations. As successful remediation requires a victim-led, consultative, and multi-stakeholder approach, the process will be applied on a case-by-case basis. Telent commits to working collaboratively with all relevant parties, including the police to investigate and address any instances, ensuring that affected workers are not further harmed during the process.

Training

We provide mandatory anti-slavery and human trafficking training to all new employees as part of their induction, with a compulsory refresher every two years to maintain awareness and understanding. This ensures all employees are equipped to identify and report potential risks or concerns.

Additionally, Procurement staff receive enhanced ethical probity training on an annual basis. This includes specific guidance on recognising modern slavery indicators within supply chains, conducting due diligence, and applying appropriate mitigation measures.

Training is delivered through our corporate e-learning and compliance platforms and is closely monitored for completion. Training materials are a mixture of internally developed training programmes and programmes developed by external providers.

Monitoring and Evaluation

We have a committed compliance team, which includes stakeholders from our Legal, Procurement, HR and Talent Acquisition departments. To evaluate our performance in combating modern slavery, we monitor the following KPIs bi-annually and report to the Board.

Target	Measure
100% of new staff to complete anti-slavery induction training	Completion reports from e-learning platform
100% of suppliers above the £36m threshold to provide modern slavery statements	Collected and recorded in the supplier database
100% of higher-risk suppliers to publish an Anti-Slavery Policy, or acknowledge and comply with ours	Written confirmations retained and tracked
100% of Procurement staff to complete Ethical Probity training annually	Completion reports from e-learning platform

The Modern Slavery Assessment Tool (MSAT)

Telent is committed to continuously enhancing transparency and safeguarding measures to reduce the risk of worker exploitation within our supply chain. We complete the Cabinet Office’s Modern Slavery Assessment Tool (MSAT) on an annual basis. The MSAT supports organisations in identifying potential modern slavery risks in the supply chains of procured goods and services.

Our current MSAT score is 97% with zero risk-flags. This score was improved from 93% previously by actioning the suggested improvements.

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Further steps

Since our last statement, we have:

- Introduced a new KPI – 100% of Procurement staff to complete Ethical Probity training annually
- Reported zero confirmed incidents of modern slavery
- Aligned our 3rd party anonymous reporting service with the Group
- Renamed our Speak Up Policy to Whistleblowing Policy to align with the Group
- Updated our Anti-Slavery policies to refer to Navex

In the next year, we will:

- Maintain bi-annual auditing and Board reporting
- Align and update our policies and procedures to align with Group
- Review our KPI framework and supplier monitoring processes
- Complete the MSAT evaluation and action any suggested improvements
- Continue to mirror customer payment terms in our supplier contracts

Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2026.

This statement has been approved by our board, who will review and update it annually.

Georgia Grimes

Managing Director of Technology

July 2026