



# Modern Slavery Policy

September 2026

# Modern Slavery Policy/Statement Year End March 2026

## Our Policy

MTR Group Limited is opposed to slavery and human trafficking in any part of our activities or our supply chains. We are therefore committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

We met the turnover threshold applicable under section 54 of the Modern Slavery Act 2015 in the period covered by this statement.

## Our Business

We are a repairer and remanufacturer of mobile phones and tablets in the technology sector. Seasonal work is a feature of the industry in which we operate.

More information on our business is available at [www.mtr.co.uk](http://www.mtr.co.uk).

*We are part of the AURELIUS Group, a globally active alternative investor focused on private equity, private debt and real estate. Founded in 2005, AURELIUS has a strong track record of acquiring and growing businesses through operational excellence and strategic investment. With more than 400 professionals across multiple international offices, AURELIUS supports its portfolio companies in achieving sustainable growth, transformation and long-term value creation*

## Organisational Structure and Supply Chains

Our business is organised into three main business units: Enterprise Repair, Supply and Trade In.

We purchase from and supply directly to the UK consumer. We offer warranty and non-warranty repair services on behalf of our business affiliate (Samsung) and we provide a trade-in service for consumers and B2B customers.

We source most of our products directly from UK consumers or reputable suppliers based in the UK and European Union.

We also occasionally source a number of products from suppliers in the following countries: USA and Hong Kong.

The following table contains a summary of the activities that we consider present the highest risk of slavery and human trafficking in the industries in which we operate, with, in each case, a summary of the steps we have in place to avoid these affecting our activities or our supply chains.

| Industry Risk                                                                                                                                                                                                    | Steps Taken                                                                                                                                                                                                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Conditions and treatment of workers in third party factories that supply MTR with technology products located in higher risk countries for slavery and poor working conditions and/or limited legal protections. | Any factory not meeting the standards set out in our Partner Code of Conduct along with other policies and procedures (see further sections 4 and 5 below) automatically fail the criteria and we would not purchase products from the factory. |

## Policy in Relation to Slavery and Human Trafficking

The Partner Code of Conduct sets out our Group's commitment to acting ethically and with integrity towards our employees and in all our business relationships. Specifically, Section 2 of the Code sets out our commitment to fair employment practices and Section 14 of the Code sets out our commitment to preventing, as far as practicable, slavery and human trafficking in our supply chains.

Our policy on slavery and human trafficking is set out in Section 1 of this statement.

MTR Group Limited's detailed policies and procedures incorporate the requirements of our Partner Code of Conduct, Supply Chain Integrity Policy and other internal policies. Section 6 of this statement provides further details.

## Due Diligence and Assessing and Managing Risk

As part of our compliance with the policies referred to above, we take the following steps:

- Assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains, including by reviewing, where necessary, the controls that our suppliers have in place and carrying out other suitable checks;
- Monitor potential risk areas in our supply chains on a periodic basis.

## Assurance and Key Performance Indicators

Responsibility for ensuring that our procedures are adequate and are adhered to in all areas of our activities rests with the directors of MTR Group Limited.

## Training and Awareness

In the period covered by this statement all employees in our business completed online training on our Partner Code of Conduct which covered the protection of human rights, including the prevention of slavery.

We also provide training to relevant employees on supply chain risks, including the risk of slavery and human trafficking at suitable intervals. Our participation in industry associations and our dealings with suppliers also provide information on where slavery and human trafficking risks may arise in the industries where we are active and best practice in avoiding them.

## Nature of this Statement

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 ended 31 March 2025.

This statement has been approved by the board of directors of MTR Group Limited



---

James Goddard  
Managing  
Director MTR  
Group Limited  
08/09/2026