

Slavery and Human Trafficking statement made on behalf of all companies within the RED Group for the purposes of section 54(1) of the UK Modern Slavery Act 2015 during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking in our business and supply chains.

Statement by the Chief Executive Officer of the RED Group

RED is committed to ensuring fair working conditions across the Group and preventing modern slavery and human trafficking in its operations and supply chains.

Given the nature of our business, RED's Board of Directors and Management teams consider that there is minimal risk that either the RED Group or its supply chains which support our business activities are in any way involved in, supportive of, or complicit in slavery or human trafficking.

The employment and procurement practices operated by RED ensure that companies within the group commit to act ethically and with integrity in all business relationships; enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or in any of our supply chains. We expect the same high standards from all our contractors, suppliers and other business partners.

RED Group Structure

RED Group, including its main trading entity Red Commerce Limited, is primarily a staffing and IT consulting business that sources and supplies the services of skilled IT professionals ("consultants") to provide services to its customers on a permanent or contractual basis. These consultants are either engaged directly by RED or through a business-to-business arrangement (including but not limited to consultancies or umbrella companies). The ultimate parent company, Red Global Limited, and the main trading subsidiary, Red Commerce Limited, are incorporated in the United Kingdom and headquartered in London. RED also operates offices in Germany, Switzerland, the Netherlands, Poland, India and the USA and has over 300 employees worldwide. The RED Group operates largely in these jurisdictions, but also conducts business in many other countries around the world.

RED Supply Chains

RED's supply chains are limited to the provision of staffing and recruitment solutions. We engage technically skilled professionals in the IT sector as well as general professional service organisations. We operate a preferred supplier list (PSL), all of whom have been subject to careful due diligence and periodic auditing to analyse both their sustainability and credibility.

We use routine services for the maintenance and support of our office operations such as property management, cleaning and technical support services for such things as IT infrastructure, software, telephones, equipment, and communications infrastructure.

We do not act as a producer, manufacturer or retailer of physical goods and have no supply chain in relation to such activities.

Anti-slavery policy statement:

"The RED group has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business."

This anti-slavery policy statement is the principal articulation of the RED Group's policy on slavery and human trafficking. It is intended to inform and influence all the operational procedures within

the RED Group and is a focal point of reference when the company seeks tenders for service or when RED carries out routine audit and compliance screenings of our suppliers.

Due Diligence and Implementation Processes

The RED Group operates primarily in industries and with consultants that would not ordinarily be considered to be at risk of the perils of modern slavery and human trafficking. Notwithstanding this, we take our obligations and responsibilities in this regard very seriously and, as part of our initiative to identify and mitigate risk, we operate a range of policies and procedures appropriate to the RED Group's structure and operations.

These include:

Remuneration: RED works closely with all business partners - including clients, umbrella companies, and suppliers - to ensure that all individuals engaged through our services are paid fairly and in line with the nature of the work performed, market conditions, and applicable legal standards. We require clear confirmation that remuneration meets or exceeds statutory minimums in the relevant jurisdiction and that no unlawful deductions, withholding of wages, or exploitative financial arrangements are in place. RED is fully compliant with all National Minimum Wage legislation in the countries in which it operates and does not place individuals on zero-hour contracts. We consider remuneration transparency to be a key indicator of modern slavery risk. Any inconsistencies, such as below-market rates, vague payment structures, or third-party diversion of funds, are flagged for investigation by our Legal & Compliance team.

Recruitment Procedures: RED's recruitment model combines direct applications, referrals, targeted search, and outreach through our global candidate network. We are committed to ethical recruitment practices that respect the dignity and rights of all individuals, and we take active steps to ensure no one is recruited through coercion, deception, or undue influence.

All RED employees and consultants placed with clients undergo thorough background checks to confirm they are genuine applicants, freely seeking work, and appropriately qualified. Our internal recruitment team is trained in best practice screening protocols, including identity verification, right-to-work checks (where applicable), reference validation, and skills/experience matching.

Where services are provided via a business-to-business arrangement, RED conducts additional screening to assess the true nature of the working relationship and ensure the consultant is not subject to exploitation, false self-employment, or fee-charging recruitment practices.

RED strictly prohibits the charging of recruitment or onboarding fees to candidates and takes any reports of such practices seriously, with escalation to Legal & Compliance for investigation and, where appropriate, supplier disengagement.

On-Boarding Procedures for Consultants:

Compliance checks: As part of its commitment to ethical recruitment and preventing modern slavery, RED applies robust onboarding procedures for all consultants and third-party suppliers. We obtain and verify documentation to confirm the legal identity, right to work, and employment status of every individual engaged. Contractual assurances are required to confirm adherence to RED's policies on ethical employment, fair remuneration, and compliance with all applicable labour and human rights laws - including the UK Modern Slavery Act 2015. RED monitors all placements throughout the recruitment lifecycle and investigates any gaps in documentation or indications of

irregularity. Any reluctance or failure to provide required compliance documents is treated as a potential red flag and escalated promptly for review by the Legal & Compliance team.

Payments: RED makes payments exclusively to the verified contracting entity of each supplier or consultant, and only after obtaining clear contractual assurances that the individual performing the services is legally employed or engaged by that entity. We require confirmation that all relevant labour, immigration, tax, and minimum wage laws are being complied with, and that the individual is working voluntarily, under fair terms, and free from coercion or exploitation. No payments are processed where there is any doubt about the legitimacy of the engagement or the legal status of the working arrangement. Where subcontracting is involved, RED requires full transparency of the contractual chain to ensure ethical and lawful practices are upheld throughout.

Working conditions: RED collaborates closely with clients to ensure that all working environments (whether on client sites or remote) meet legal and ethical standards, including those relating to health and safety, dignity at work, and fair treatment. As part of our placement process, we routinely seek and obtain assurances from clients that appropriate working conditions are in place, in compliance with relevant labour laws and international human rights standards.

Where consultants operate on third-party sites, RED monitors for indicators of exploitative or unsafe working conditions and takes seriously any concerns raised by contractors or internal staff. Any red flags are investigated by our Legal & Compliance team in coordination with the client.

Within RED Group companies, employee rights - including those related to working hours, leave, wellbeing, and non-discrimination - are clearly articulated in employee handbooks and individual contracts of employment, and regularly reviewed to reflect evolving best practices.

Corporate Governance: RED's governance framework includes oversight from the Group Head of Legal & Compliance, the Group Head of HR, the Chief Financial Officer (for internal audit and risk). RED Group also operates an Operational Board which includes the country and/or divisional directors within the group, all of whom have reviewed and agreed to the terms of this statement. Each of these departments and executives have reporting responsibilities to management and the various boards of companies within the RED group.

The RED group uses the services of **KPMG** as its external auditor. A combination of these procedures and functions operate to help identify, assess and monitor potential risk areas in our operations and mitigate the risk of slavery and human trafficking occurring in our supply chains.

Training: All RED staff and relevant third parties receive training on recognising and responding to signs of modern slavery. This includes: annual compliance training with modern slavery modules, ongoing reinforcement of RED's ethical code and expectations, onboarding education for all new hires.

In the current financial year (April 2025 – March 2026), RED is building on its existing modern slavery risk programme. Having successfully:

- Rolled out a Supplier Code of Conduct requiring compliance with anti-slavery and human rights standards
- Completed the implementation of a supplier assessment questionnaire across the PSL.

RED will now conduct a targeted desktop audit of selected high-risk suppliers, including umbrella companies and subcontractors operating in higher-risk jurisdictions, to verify compliance with modern slavery and employment standards.