

FOREWORD FROM OUR CEO



At TPXimpact, we unequivocally condemn modern slavery as a grave human rights violation. This FY26 statement declares our resolute commitment to its eradication. With over 23,000 UK cases in 2025, vigilance is crucial. We've strengthened policies to prevent risks across our operations and supply chains.

FY26 saw our Modern Slavery Assessment Tool (MSAT) score rise from 88% to 91% due to rigorous measures, including responsible recruitment and a strict 48-hour incident response. We aligned with the Walk Free Foundation, auditing 100% of our supply chain. We identified a potential modern slavery issue and this was reported in our audit and it has since been removed from our supply chain. The feedback from MSAT was that there were no recommended actions for us to improve on.

For FY27, we intend to continue on with the work we have been doing in the audit space, extending to Tier 2-4 suppliers. We will ensure that the mandatory training is completed and continue meeting BCorp commitments. This statement was approved by the ESG committee on behalf of the Board on 22 July 2026, aligns with UN Guiding Principles and SDGs and signifies our ongoing dedication to a more ethical, just world, free from modern slavery.

Björn Conway

CEO

TPXimpact Holdings PLC

The Hickman (Second Floor), 2 Whitechapel Road,
London, United Kingdom, E1 1EW
Company Number 10533096, Registered in England and Wales
VAT No: 448866928

TPXimpact

July 2026

MODERN SLAVERY & HUMAN RIGHTS STATEMENT

Executive Summary

Modern Slavery (MS) is a grave violation of human rights that affects millions of people around the world. There were 23,411 cases reported to the UK Home Office through the National Referral Mechanism (NRM) in 2025 ([published February 2026](#)). These numbers are continuing to grow with a 22% increase on the previous year. 25,390 conclusive ground decisions were made in 2025, representing the highest number in a single year since the NRM began operation.

At TPXimpact, we recognise that every company, no matter the industry, is at risk of being involved in MS through its own operations and its supply chain. We are fully committed to preventing slavery and human trafficking in all forms throughout our operations and supply chain. We also ask our employees to be aware of identifiers of MS outside of their roles as employees. We are publishing this statement in accordance with Section 54 of the Modern Slavery Act 2015 (MS Act) for the financial year ending 31 March 2026 (FY26), but also to demonstrate transparency to our stakeholders on this important issue. This statement sets out the actions that we have taken, are taking, and plan to implement to manage and reduce the risks of MS within our supply chain.

We have ensured that our policies now encompass specific measures to prevent, detect, and address modern slavery within our operations and supply chains, including responsible recruitment practices. These policies demonstrate how we engage with workers and suppliers, utilise audits or worker voice mechanisms, and respond to any identified incidents within a strict 48-hour timeframe, providing remedy and compensation where necessary. As a result of these measures, we are pleased to report an increase in our score from 88% in FY25 to 91% in FY26 on the UK Government's Modern Slavery Assessment Tool (MSAT).

Organisational Structure and Supply Chains

TPXimpact was founded as an impact-driven business. We are proud of the work that we have done to ensure that as the business grows, it does so responsibly, with the best interests of our People, Planet, and Community in mind. It is our objective as a business to drive fundamental change in approaches to product and service development, delivery and technology. With experts spanning the public sector, health, not for profit, education and the commercial sector, we're transforming the organisations, technology, and services people rely on. The business continues to operate through 3 units:

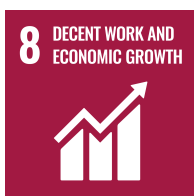
- TPXimpact
- manifesto
- Keep IT Simple

At TPXimpact, we are committed to aligning our approach with the United Nations Guiding Principles on Business and Human Rights. We are also guided by other internationally recognised frameworks, such as:

- The International Labour Organisation's Declaration of Fundamental Principles and Rights at Work;
- The International Bill of Human Rights, which includes the UN Declaration of Human Rights

In line with the Modern Slavery Act (MSA), we are publishing our annual Modern Slavery & Human Rights Statement. This statement highlights the steps we've taken to identify and address modern slavery and human trafficking within our operations, supply chain, and customer base. It also shares the actions we've implemented to support survivors of modern slavery and outlines the improvements we plan to make in the year ahead.

We are dedicated to supporting the UN Sustainable Development Goals (SDGs), with a particular focus on:



SDG 8.7 – Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking, and secure the prohibition and elimination of the worst forms of child labour.



SDG 16.2 – End abuse, exploitation, trafficking, and all forms of violence against and torture of children.



SDG 10.7 – Facilitate orderly, safe, regular, and responsible migration, which helps reduce vulnerability to trafficking and exploitation.



SDG 5.2 – Eliminate all forms of violence against women and girls in public and private spheres, including trafficking and sexual exploitation.

Assessing and Managing Risk

During FY26, we continued to strengthen our approach to identifying and managing modern slavery risks across our operations and supply chain, building on the foundations established in FY25. Our focus has been on improving risk visibility, enhancing supplier engagement, and embedding robust mitigation processes.

Key achievements this year include:

- Further alignment of our methodology with the Walk Free Foundation, enabling more consistent identification and reduction of risk across our supply chain
- Completion of audits covering 100% of our supply chain, alongside strengthened collaboration with suppliers to uphold high ethical standards
- Improvement of our Modern Slavery Assessment Tool (MSAT) score to 91%, driven by targeted engagement with suppliers identified as higher risk
- Delivery of focused training to the Finance, People, and Resourcing teams to improve awareness of modern slavery indicators and practical risk mitigation actions
- Continued compliance with reporting requirements through publication of our Modern Slavery Statement

Throughout FY26, our high-level risk assessments demonstrated a consistent reduction in suppliers identified as at risk. By Q4, remediation actions implemented earlier in the year had successfully reclassified a number of suppliers from higher-risk categories to low risk. This resulted in an overall 16.89% reduction in suppliers identified as potential risks between Q1 and Q4.

By the end of the financial year:

- **No suppliers were classified as high risk**
- **Two suppliers remained classified as medium risk**, both of which are subject to ongoing remediation actions

Our detailed assessments identified an increase in the number of suppliers flagged as medium or high risk over the course of the year. This reflects both the continued growth of our supply chain and the increasing sophistication of our audit processes, enabling improved detection of potential risks. Importantly, this demonstrates the effectiveness of our approach in proactively identifying, managing, and mitigating modern slavery risks as they emerge.

FY26 Supply Chain Audit Results

Detailed Assessment Results

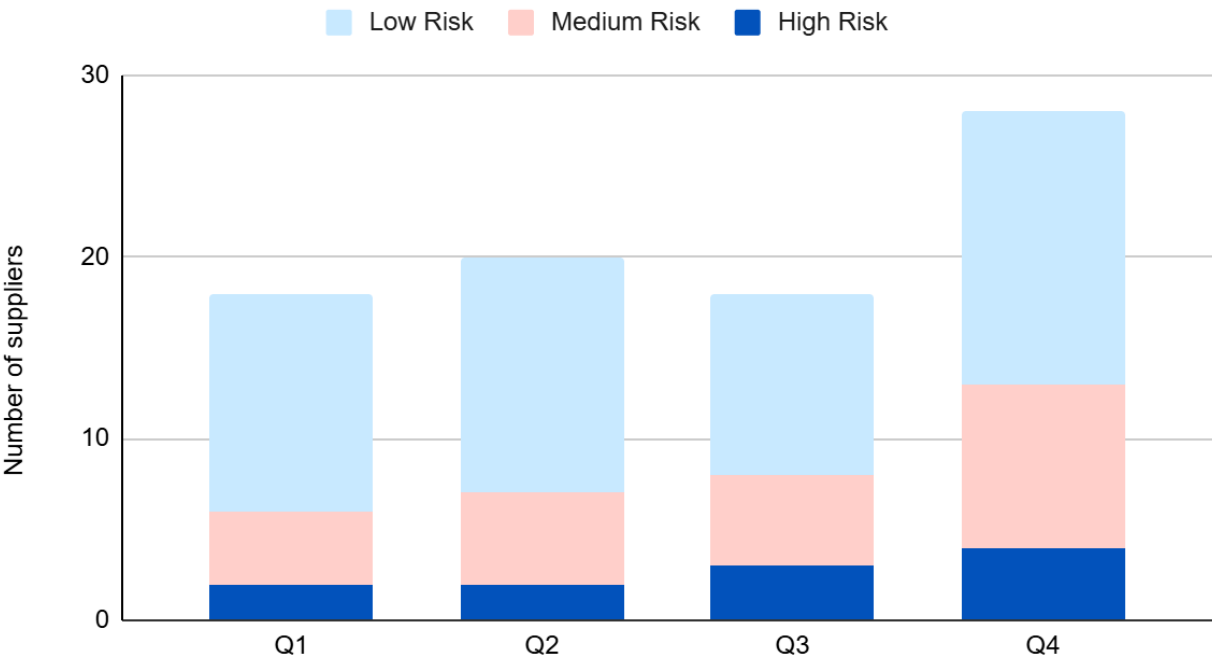


Table 1: Number of Suppliers flagged on the Audit through FY26

Due Diligence & Action

In FY25, we identified a supplier classified as high risk through our due diligence processes. As part of our assessment, the supplier completed our self-assessment questionnaire; however, they were unable to provide sufficient evidence to demonstrate compliance with the Modern Slavery Act 2015.

In managing this case, we carefully balanced the need to protect employee welfare with our commitment to mitigating modern slavery risks within our supply chain. Despite engagement and opportunity to provide further assurance, the supplier was unable to meet our required standards.

As a result, in FY26 we made the decision to cease working with the supplier. This action reflects our zero-tolerance approach to modern slavery and reinforces our commitment to maintaining a responsible and ethical supply chain.

Policies

TPXimpact operates the following policies for identifying and preventing slavery and human trafficking in our operations. These are shared to all employees via the internal website:

- **Modern Slavery and Human Rights Policy** – As a company we stand against MS and give our employees the tools and training to spot and report potential suspicions of slavery/human trafficking.
- **Salient Human Rights Issues** – As part of our commitment to B Corp standards, this document identifies and addresses the most significant human rights risks and impacts associated with an organisation's operations, products, services, or supply chains.
- **Whistleblowing Policy** – We encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- **Equality, Diversity & Dignity Policy** – Any behaviour which is inconsistent with treating others with dignity and respect is prohibited. In particular, this policy prohibits discrimination, harassment, third party harassment and bullying.
- **Flexible Working Policy** – We allow our own employees flexibility in how, where, and when they work.
- **Talent & Recruitment Policy** – We treat all applicants equally and undertake rigorous background checks on applicants before an offer is submitted. We confirm that we have never engaged in any form of debt bondage and this policy now specifically calls this out, ensuring the fair and respectful treatment of all individuals.

- **ESG Policy** – We prohibit any type of work which, by its nature or the conditions in which it is carried out, is likely to compromise health, safety or morality and any behaviour contrary to dignity at work.
- **Commercial and Procurement Policy** – This details what background checks TPXimpact will undertake on all companies in our supply chain. This requires all clients and suppliers to comply with the MS legislation.

Awareness & Training

TPXimpact continues to build awareness of modern slavery risks across the organisation through a structured programme of training and engagement. During FY26, we:

- Included our Modern Slavery and Human Rights Statement within the induction materials for all new employees
- Delivered a company-wide awareness campaign to help employees identify key 'red flags' associated with modern slavery and human trafficking, both within the workplace and externally, along with clear reporting mechanisms
- Embedded face-to-face modern slavery awareness training into the onboarding process for all new employees
- Provided enhanced, role-specific training for employees involved in supplier onboarding, with this programme also available to all employees as an optional development opportunity
- Incorporated modern slavery awareness into mandatory annual compliance training for all employees
- Supported members of the Commercial & Procurement team to complete Chartered Institute of Procurement & Supply (CIPS) training in ethical procurement and supply chain management
- Established internal capability through trained Modern Slavery First Responders, ensuring that appropriate support and expertise are available to identify, escalate, and respond effectively to potential cases

Monitoring and Evaluation

TPXimpact has defined four key areas to combat MS and human trafficking in our organisation and supply chain. In the financial year to 31 March 2025, we developed the following commitments and set out status updates below on those commitments as at June 2026:

Commitment	Action	Timeline & RAG Status	KPI	Update
Compulsory General Training	Ensure all staff complete the training	End of Q1	100% of staff completed	81% have currently completed the training. The remaining staff have been sent reminders. Progress to green: The compliance team is currently tightening up processes to ensure this rate increases in FY27 onwards.
Provide Targeted Training	Provide training to internal staff relevant to their roles	4 times by End of FY26	At least 50% of staff trained	Training was completed 4 times in FY26 and specifically targeted the People team, the Resource & Ops team, the Commercial & Procurement team and the Finance team, all of whom have roles where it is essential to identify the signs of MS and know how to act upon it. We have enhanced our checks in finance and added a process in the people team to double-down our efforts in ensuring our direct supply chain is
Increase MSAT Score to 95%	Complete actions required to increase MSAT score	End of FY26	MSAT Score	We achieved an MSAT score of 91%. This score reflects our rigorous risk management processes, including the identification and remediation of a potential supply chain risk, the impact of which is accounted for in the assessment methodology over a 12-month period.

Ensure relevant BCorp Commitments Met	Meet BCorp standards: • HR1 The company commits publicly to respecting human rights. • HR2 The company knows its salient human rights issues and has a strategy to address them. • HR3 The company prevents, mitigates, and remediates actual and potential negative human rights impacts. • HR4 The company works with suppliers to achieve its human rights objectives.	End of FY26	% score	100% achievement against all commitments. HR1: Fulfilled by the publication of this Modern Slavery & Human Rights statement. HR2: Addressed through our published Salient Human Rights issues document. HR3: Supported by our established prevention, risk mitigation, and remediation systems, including our 48-hour incident response protocol. HR4: Maintained through continuous supply chain auditing and proactive supplier engagement.
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Ongoing improvement

In the financial year to 31 March 2027, we make the following commitments:

Commitment	Action	Timeline & RAG Status	KPI	SDG Alignment
Compulsory General Training	Ensure all staff complete the mandatory training	End of FY27	100% of staff completed	Goal 8: Decent work and economic growth Goal 5: Achieve gender equality and empower all women and girls Goal 16: Peace, Justice and Strong institutions
Ensure relevant BCorp Commitments Met	Meet BCorp standards – - HR1 The company commits publicly to respecting human rights. - HR2 The company knows its salient human rights issues and has a strategy to address them. - HR3 The company prevents, mitigates, and remediates actual and potential negative human rights impacts. - HR4 The company works with suppliers to achieve its human rights objectives.	End of FY26	% score	Goal 10: Reduce Inequalities Goal 5: Achieve gender equality and empower all women and girls Goal 8: Decent work and economic growth Goal 16: Peace, Justice and Strong institutions
Tier 2–4 Supplier Due Diligence	Implement a risk assessment framework to monitor Tier 2–4 suppliers	Ongoing	Complete risk assessment for 100% of identified Tier 2–4 suppliers by end of FY27	Goal 8: Decent work and economic growth

This statement covers 1 April 2025 to 31 March 2026 and was approved by the Board of TPXimpact Holdings plc on 22 July 2026. The next statement is due to be published by 30 September 2027.



Björn Conway
Chief Executive Officer
TPXimpact
29 July 2026