

Modern Slavery and Human Trafficking Statement

For the financial year ending 31 March 2026

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by the Shaw Gibbs Group ("Shaw Gibbs", "the Group", "we", "our" and "us") during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking within our business operations and supply chains.

Shaw Gibbs is committed to conducting business ethically and responsibly. We recognise our responsibility to safeguard human rights and to ensure that modern slavery, forced labour, human trafficking and exploitation have no place within our organisation or supply chain.

This statement reflects our ongoing commitment to identifying, assessing and addressing modern slavery risks and demonstrates the measures we have taken throughout the reporting period.

1. Our Business

Shaw Gibbs is a UK-based professional services group providing accountancy, audit, tax, payroll, outsourcing and advisory services to businesses and individuals.

We operate from multiple offices across the South of the UK and engage a variety of suppliers and service providers to support our operations. We also utilise selected offshore partnerships to support data processing and transactional activities where appropriate.

Whilst the professional services sector is generally considered lower risk for modern slavery we recognise that risks may still exist within parts of our supply chain and we are committed to taking reasonable and proportionate steps to identify and address those risks.

2. Our Commitment

Shaw Gibbs maintains a zero-tolerance approach to modern slavery and human trafficking.

We are committed to:

- Acting ethically and with integrity in all business dealings.
- Implementing effective systems and controls to minimise the risk of modern slavery.
- Promoting awareness of modern slavery across our workforce.
- Working with suppliers who share our commitment to ethical labour practices.
- Taking action where any concerns are identified.

We expect the same high standards from all contractors, suppliers, partners and other third parties acting on our behalf.

3. Our Structure and Supply Chains

Our supply chain primarily consists of suppliers supporting our office-based professional services operations. These include:

- Facilities management providers.
- Cleaning and maintenance contractors.
- Security providers.

- Recruitment agencies and temporary labour suppliers.
- Information technology and telecommunications providers.
- Office furniture and equipment suppliers.
- Marketing and promotional merchandise suppliers.
- Professional advisers and outsourced support services.

Through our risk assessment process, we have identified that certain sectors present a higher inherent risk of modern slavery than others. These include:

- Cleaning and facilities management services.
- Temporary and agency labour.
- Manufacturing and sourcing of IT hardware.
- Promotional merchandise and branded goods.
- Certain offshore support arrangements.

These areas continue to receive increased scrutiny as part of our supplier due diligence activities.

4. Governance

Responsibility for our approach to modern slavery sits with the Executive Leadership Team and Board of Directors, which oversees the effectiveness of the Group's policies, procedures and risk management framework.

Operational oversight is provided through a multidisciplinary approach involving:

- Operations.
- Procurement and supplier management.
- Information Technology.
- People and Culture.
- Compliance

The relevant functions are responsible for monitoring emerging risks, coordinating proportionate action and escalating material concerns to the Executive Leadership Team and Board. The Group reviews its approach annually to ensure that policies, procedures and controls remain effective and proportionate to the risks faced by the organisation.

5. Policies and Procedures

Our commitment to preventing modern slavery is supported through our wider governance framework, including:

Modern Slavery and Human Trafficking Policy

Our policy outlines responsibilities for employees and managers and reinforces our zero-tolerance approach to modern slavery.

Whistleblowing Policy

Employees, contractors, suppliers and other stakeholders are encouraged to report concerns through established confidential reporting channels without fear of retaliation.

Anti-money Laundering and Counter Terrorist Financing Policy

This policy documents our approach to meeting our anti-money laundering and counter terrorist financing obligations. Through client due diligence, risk assessments and ongoing monitoring procedures, the policy supports the identification of higher-risk clients, sectors and activities, including those that may present indicators of modern slavery, human trafficking or labour exploitation.

Equality, Diversity and Inclusion Policy

We are committed to maintaining and developing a working environment that promotes inclusive and equitable practices, and to empowering our people and ensuring every individual is treated with dignity and respect. This extends to our relationships with clients, suppliers, contractors and third parties.

Procurement and Supplier Management Processes

Our supplier engagement processes promote ethical sourcing and require suppliers to comply with applicable legal and regulatory requirements.

Recruitment and Employment Practices

We operate robust recruitment procedures designed to ensure that all employees have the legal right to work and are employed freely and voluntarily.

These policies are reviewed periodically to ensure they remain current and effective.

6. Due Diligence and Risk Assessment

During the reporting period we continued to strengthen our approach to supplier due diligence and risk management.

Key activities included:

- Reviewing supplier categories to identify areas of increased risk.
- Incorporating modern slavery considerations into supplier onboarding and contractor due diligence processes.
- Seeking assurances from relevant suppliers regarding compliance with modern slavery legislation.
- Reviewing contractual arrangements where appropriate to support ethical labour standards.
- Monitoring third-party relationships that may present elevated risk due to geography, industry sector or labour profile.

We adopt a risk-based approach, focusing resources on suppliers and services where the potential exposure to modern slavery is considered greatest.

7. Training and Awareness

Awareness plays a critical role in identifying and preventing modern slavery.

During the year, Shaw Gibbs continued to promote awareness of modern slavery risks through:

- Employee communications.

- Policy publication and accessibility.
- Management awareness activities.
- Integration of compliance requirements within operational processes.

As part of our ongoing programme, modern slavery awareness training will continue to be embedded within onboarding and compliance initiatives to further improve understanding across the Group.

8. Reporting Concerns

We encourage anyone working for, with or on behalf of Shaw Gibbs to raise concerns regarding actual or suspected instances of modern slavery or unethical labour practices.

Concerns may be reported through management channels or via our whistleblowing procedures and will be investigated appropriately.

We are committed to ensuring that individuals raising concerns in good faith do not suffer retaliation or detriment as a result.

9. Measuring Effectiveness

To assess the effectiveness of our approach, we monitor several indicators including:

- Completion of modern slavery awareness activities.
- Review of high-risk suppliers.
- Supplier compliance declarations obtained where appropriate.
- Number of concerns reported through whistleblowing or other channels.
- Actions taken in response to identified risks.

No incidents of modern slavery or human trafficking were identified within our direct operations during the reporting period.

10. Priorities for 2026/27

Over the next twelve months, Shaw Gibbs intends to further strengthen its approach by:

- Continuing supplier risk assessments and due diligence activities.
- Enhancing modern slavery awareness across the business.
- Expanding supplier assurance requirements for higher-risk suppliers.
- Reviewing procurement processes to ensure modern slavery considerations remain embedded.
- Continuing to integrate acquired businesses into the Group's governance and compliance framework.
- Monitoring developments in legislation and best practice to ensure ongoing compliance.

11. Board approval

This statement has been approved by the Board of Directors of Shaw Gibbs on 5 April 2026 and will be reviewed and updated annually by the modern slavery team.

Signed



Peter O'Connell

CEO

5 April 2026