

Modern Slavery Statement

Financial Year ended 31 December 2025.

This statement is made pursuant to section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 to ensure that our business and our supply chains are free from slavery and human trafficking.

Organisational Structure

Liberata is a provider of business and professional services including process outsourcing and automation. We operate exclusively within the UK, primarily within the public sector market, providing specialist business process and transaction management services to central and local government. We operate from multiple locations across England and Wales, employing c1000 people.

Liberata UK Limited is a subsidiary of Brexa International Limited, which is ultimately owned by K.K. BCJ-77 Inc. a multi-national company headquartered in Japan and privately held by Bain Capital Investors LLC.

K.K. BCJ-77 Inc (the Group) is a Japanese parented group operating in the UK through several UK entities (the UK sub-group). The Group focuses on enhancing the production efficiency of organisations which operate in a variety of industries across the manufacturing and non-manufacturing sectors.

Supply Chains

Liberata relies on suppliers to support its business, particularly in relation to information technology and application software services, office and facilities services, and professional legal and financial support.

Our supply chain consists of large, reputable suppliers of industry standard goods and services (themselves subject to section 54(1) of the Act), medium sized providers of specialist support services, and small, locally based suppliers of general services. Most of our suppliers are UK based.

Our Policies

We have a comprehensive range of policies and operating procedures covering the recruitment, employment and conduct of people directly engaged in our business. These policies are reviewed regularly and where appropriate an equality impact assessment is conducted.

Our expectations are clearly documented in a Code of Conduct which applies to all staff, and our employees are supported by policies covering Equality and Diversity, providing clear Grievance procedures, ensuring Dignity at Work and means to facilitate Whistleblowing.

Our policies ensure that all employees are treated fairly and equally and are paid in accordance with the law. Our employees are not contractually required to work more than 48 hours per week.

These arrangements are under-pinned through a recognition agreement with the public sector trade union, Unison enabling independent and collective representation of interests.

We have reviewed and updated current policies, practices and training provision to appropriately reference, accommodate and communicate the provisions of the Modern Slavery Act 2015.

These policies are available on our intranet to all employees, and a summary of key documents is sent to new starters.

Home and hybrid working is now a permanent feature of our business practices with the majority of Liberata employees working either entirely or partially at home. These arrangements are set out in a specific Home and Hybrid working Policy together with appropriate HR and H&S procedures and practical support as necessary.

We are confident that the practices we adopt and the terms on which we employ, manage and organise our workforce are of a high standard and effectively safeguard against the exploitation, abuse or coercion of the people we employ.

Due Diligence

We have preferred suppliers across many parts of our supply chain and employees are encouraged to use them. Prior to engagement any potential new suppliers are subject to a process of due diligence which includes assessment of financial standing, and confirmation of trade references.

We have a Supplier Code of Conduct for our suppliers to adopt, the requirements of which reflect our own internal standards, and our Standard Supplier Terms and Conditions reference obligations under the Modern Slavery Act 2015. We have previously engaged with our key suppliers to assess their practices and procedures and have conducted a process to confirm that key suppliers have themselves published appropriate Slavery and Human Trafficking Statements on their websites.

Risk Assessment and Management

The nature of our business, the expectations of our customers, and the relationships which we have with our suppliers, lead us to believe the likelihood of slavery or human trafficking being present within our operations, to be low.

Key Performance Indicators

We plan to conduct a review of the supplier key performance indicators that are used within the business, ensuring the effectiveness of our internal processes with regards to Modern Slavery.

Training

We utilise an online Modern Slavery training course through our provider Bobs Business for all Managers and other key roles within the business who have a direct responsibility for upholding Liberata's commitments with regards to this Act. We will extend this training to all employees during 2026 and continue to track training and awareness through attendance and effectiveness of this course.

A copy of this statement is also made available to all employees on Liberata's website.

Liberata UK Limited has adopted the principles of the UN Global Compact (<https://www.unglobalcompact.org/what-is-gc/mission/principles>), we recognise the reality of human slavery and our responsibility, and the responsibility of our partners, to ensure the protection of human rights.

Signed



Name of Director Robert Price

Approved by the Board of Directors of Liberata UK Limited

Date 18/6/26