



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

2025/26



INTRODUCTION

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Gist Limited (“Gist”) during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking in our business operations and supply chain. Modern slavery, including servitude, forced labour and human trafficking, remains a significant global issue. Gist has a zero-tolerance approach and expects all colleagues, suppliers and partners to uphold the highest standards in line with our values, policies and Code of Business Conduct.

All colleagues are encouraged to raise concerns through appropriate channels. Our leaders are responsible for ensuring concerns are taken seriously and acted upon.

OUR BUSINESS

Gist is a UK-based logistics business, wholly owned by Marks and Spencer Group plc. We employ approximately 6,100 colleagues across the UK and Republic of Ireland.

We provide logistics and supply chain services including retail distribution, primary logistics and global freight management. Our operations rely on a combination of directly employed colleagues, labour providers and third-party suppliers.

At Gist, we recognise that modern slavery risks can arise across logistics operations, particularly in:

- temporary and agency labour
- outsourced services
- subcontracted transport
- lower-visibility tiers of the supply chain

Our supply chain includes core suppliers, service providers and labour-related partners, including agency worker providers.

POLICIES & GOVERNANCE

Gist maintains a Modern Slavery Policy aligned to the requirements of the Modern Slavery Act and endorsed by the Board.

All suppliers are required, through procurement processes and contractual terms, to comply with our Code of Business Conduct. This includes a clear prohibition of modern slavery and human trafficking in any form.

Oversight of modern slavery risk sits with senior leadership and is reviewed through established governance forums, with input from Procurement, HR and Corporate Governance functions.

SUPPLY CHAIN DUE DILIGENCE

Internal Due Diligence Activities

Our approach to identifying and managing modern slavery risks includes:

- Completion of SEDEX Self-Assessment Questionnaires (SAQs)
- Targeted SMETA audits at selected sites
- Internal reviews of modern slavery risks and associated controls

During the year, we completed a targeted review of modern slavery risks within our operations and identified actions to support continuous improvement.

Supply Chain Due Diligence Activities

We work with our suppliers to promote ethical labour practices and manage modern slavery risks throughout our supply chain. This includes:

- Supplier onboarding requirements aligned with our Code of Business Conduct
- Contractual clauses addressing modern slavery compliance
- Ongoing review of key suppliers' modern slavery statements, policies and controls

During the year, we reviewed our core suppliers, including agency labour providers, to assess their commitment to preventing modern slavery and the effectiveness of their controls.

CONFIDENTIAL REPORTING

Gist operates a Confidential Line and online reporting portal, managed by Safecall, which is available to colleagues and third parties.



This provides a secure channel to raise concerns relating to the Code of Business Conduct, including modern slavery risks. Gist strictly prohibits retaliation against anyone who raises a concern in good faith.

No cases of modern slavery were identified during the reporting period. However, we recognise that this does not eliminate risk, and we continue to strengthen our detection, assurance and worker voice mechanisms.

TRAINING AND AWARENESS

We continue to build awareness of modern slavery risks across the business through colleague communications, guidance and established people processes.

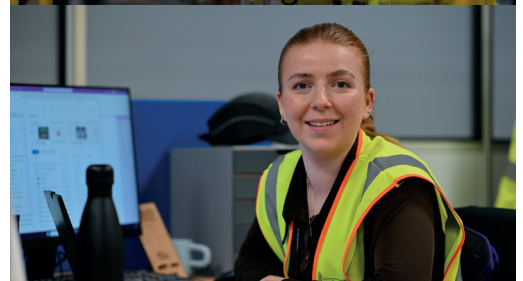
During the year, we:

- Included modern slavery awareness information within colleague induction materials
- Maintained awareness through site-based posters and communications highlighting key warning signs and routes for raising concerns
- Continued to embed processes within our People Services and Payroll teams to help identify and escalate potential indicators of worker exploitation
- Began developing enhanced manager guidance, drawing on materials from Stronger Together, to support managers in recognising and responding to potential modern slavery risks

Awareness materials focus on identifying indicators of exploitation, including:

- Retention of personal documents
- Unusual payroll arrangements or financial control by third parties
- Restrictions on an individual's freedom of movement
- Barriers to speaking up or accessing support

We recognise the importance of providing targeted modern slavery training and will continue to develop our approach to ensure colleagues and managers are equipped to identify concerns and take appropriate action.



OPERATIONAL CONTROLS

Gist maintains robust Right to Work verification processes across all sites. We also monitor key employment data to help identify potential indicators of labour exploitation, such as irregular or inconsistent personal or payroll information.

AUDIT AND EXTERNAL FRAMEWORKS

Gist is a member of SEDEX and uses the SAQ framework to assess performance across sites. Assessment results are shared on the SEDEX platform.

During the year, we completed a SMETA audit at our Chesterfield site and shared learnings across the wider network to support continuous improvement.

PRIORITIES FOR 2026

We are committed to continuously strengthening our approach to preventing modern slavery and embedding responsible business practices across Gist. During 2026, we will focus on:

- Embedding updated modern slavery materials, guidance and resources across the business
- Continuing to raise awareness of modern slavery risks and enhancing manager-specific training programmes
- Defining modern slavery governance arrangements and key metric reporting for high-risk and key suppliers
- Strengthening cross-business and cross-functional relationships with M&S teams to share learnings, promote best practice and enhance the scope and quality of reporting
- Further improving governance, oversight and reporting to support continuous improvement



APPROVAL

This statement has been approved by the Board of Directors of Gist Limited and is published in accordance with Section 54 of the Modern Slavery Act 2015.

A handwritten signature in black ink, appearing to read 'Kevin Bennett', written over a light grey background.

Kevin Bennett
Chief Executive Officer
Gist Limited

Date: 12 July 2026