

MEARS GROUP PLC MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Version

This Statement relates to the financial year ended 31 December 2025. It is published by Mears Group PLC and its relevant subsidiaries in accordance with the UK Modern Slavery Act 2015 (“the Act”).

Our Ethos - A message from Lucas Critchley, CEO

“Mears recognises and respects the dignity and worth of every individual and we are committed to upholding human and workplace rights across our group of subsidiary companies and associated supply chain. Whilst the nature of our business as a leading provider of services to the housing sector means our internal risk of modern slavery and human trafficking violations is low, we acknowledge that a higher risk may exist in our supply chains. Accordingly, we strive to ensure that robust partnering requirements, onboarding due diligence and operational review procedures are in place and effectively implemented, to minimise the risk of our supply chain tolerating or benefiting from, any form of modern slavery or human trafficking. Our corporate ethos is to do all we can to eradicate modern slavery and human trafficking, not because the law says we must, but because it is the right and proper thing to do. We are wholeheartedly

committed to achieving this goal and to playing our part in the drive to ensure all people are treated fairly and ethically. Mears appreciates and embraces the challenges this ethos carries with it. There is always more that can be done and so we will continue to work hard to ensure our strategy and approach adapts to the changing risks in this area”.

Lucas Critchley, CEO

Introduction

The purpose of this Statement is to outline the steps being taken by Mears Group PLC and its subsidiaries (“Mears” or “the Group”), to ensure that it meets its obligations under the Act and addresses the risk of modern slavery and human trafficking in our operations. It also provides relevant updates to our approach in the period since the publication of last year’s Statement. This Statement applies to all activities carried out by the Group, in all jurisdictions with no exceptions. This Statement extends to third party suppliers and any other parties working for or on behalf of Mears. We are fundamentally opposed to modern slavery and human trafficking in all areas of our business. We have identified and addressed the risk of modern slavery and human trafficking both at an employee level and across our supply chain.

The statements for previous years can be found on Mears’ website [here](#)

The group

Mears is a leading provider of services to the housing sector, providing a range of services to individuals within their homes. We manage and maintain around 450,000 homes across the UK and work predominantly with Central Government and Local Government, typically through long-term contracts. We equally consider the residents of the homes that we manage and maintain to be our customers, and we take pride in the high levels of customer satisfaction that we achieve.

Mears currently employs around 5,500 people and provides services in every region of the UK.

We are proud to have been ranked among the Top 10 Best Big Companies to Work For by Best Companies. The insights gained from colleague feedback help us to understand areas in which we can further improve.

In partnership with our Housing clients, we provide property management and maintenance services. Mears has extended its activities to provide broader housing solutions to solve the challenges posed by the lack of affordable housing and to provide accommodation and support for the most vulnerable.

We focus on long-term outcomes for people rather than short-term solutions and invest in innovations that have a positive impact on people's quality of life and on their communities' social, economic and environmental wellbeing. Our innovative approaches and market-leading positions are intended to create value for our customers and the people they serve while also driving sustainable financial returns for our providers of capital, especially our shareholders.

We have the Mears Foundation, which is an independent, charitable arm of the group.

The Foundation is a grant-making charity that seeks to harness the goodwill, talents, and skills within Mears Group to benefit charities or good causes that provide practical help and support to vulnerable people in communities within the UK. More information about the Foundation can be found via the following link: [The Mears Foundation](#).

Operationally, we strive to self-deliver most of the services we provide through direct labour and the direct procurement of materials. Approximately 84% of our annual material spend goes to 40 national suppliers. We are supported by a network of specialist subcontractors.

All our suppliers are the subject of robust due diligence, onboarding and performance monitoring procedures. Alignment to our ethos and expectations around modern slavery and human trafficking is a fundamental requirement of working with us.

At Group level, we set expectations for how our businesses conduct their activities through our Group policies. Our core values are formulated on four pillars; 'People', 'Purpose', 'Better' and 'Together':

- ▶ We always put people first
- ▶ We do the right thing with a clear purpose
- ▶ We take responsibility and make it better
- ▶ We work and achieve together.

This is our way. It's how we work and forms the DNA of our business approach and through it we strive to make a real difference to our clients, customers and the communities we serve. More information about our culture and core values can be found here: [Our Company | Mears Group PLC](#)

Each of our businesses is required to conduct its activities to deliver conformance with these expectations, to include managing risks associated with modern slavery and human trafficking.

What we mean by modern slavery and human trafficking and the assessment of the associated risk

Mears understands that modern slavery is an umbrella term that includes a range of serious exploitative practices and labour rights abuses, debt bondage, forced labour and the worst forms of child labour.

By human trafficking, we mean arranging or facilitating the travel of another person with a view to that person being exploited.

While poor labour practices such as substandard working conditions or underpayment of workers do not meet the definition of modern slavery, we understand these forms of exploitation are high risk factors that may lead to modern slavery over time. We also appreciate that modern slavery can occur in any industry and at any point in the supply chain but is often hidden and difficult to detect.

We recognise the red flags that might identify modern slavery include complex and long supply chains with many intermediaries, supply chains with predominately migrant workers and oligopolistic industries with a small number of companies putting pricing pressures on their suppliers.

Our position on modern slavery and human trafficking

At the heart of Mears lies a strong sense of responsibility towards improving people's lives. We were proud to be named Organisation of the Year by Social Mobility UK and ranked 32nd in the national index.

Our status, creating opportunities and enabling people to develop new skills

within some of the most disadvantaged and marginalised communities in the UK.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

The Board of Mears considers that the adherence with the Act is in line with the Corporate Values and Ethical Code which it applies to all the Group's activities.

Mears is further committed to ensuring equal opportunities within all aspects of employment and values the benefits of diversity within its workforce.

Forced or compulsory labour is prohibited across all of the Group's activities including its employees and suppliers. Individuals should not be forced into involuntary labour and coercion at work is not acceptable.

Our commitment to environmental, social and governance (ESG) issues

Through robust governance and the identification and management of risks and opportunities, the Mears Board works to the highest standards of transparency and good governance. Our aim is to apply this approach consistently across the business, ensuring that ethical behaviour, transparency and openness remain central to our culture at every level.

The Board recognises that it has ultimate responsibility for setting the appropriate culture to deliver the Group's strategic objectives and create long-term value for stakeholders. The promotion of a strong ethical culture, including respect for

human rights, forms a standing element of discussion and challenge at each Board meeting.

Executive accountability for the enactment and application of this Modern Slavery Statement sits with the Chief Executive Officer. Responsibility for day-to-day implementation, monitoring and reporting is delegated to the Group Director for Health, Safety and Compliance, who chairs the internal Compliance Committee and is supported by relevant operational and procurement colleagues.

The Compliance Committee oversees Modern Slavery and Human Rights risks as part of its wider remit and reports regularly to the Group Audit & Risk Committee, which assists the Board in fulfilling its oversight responsibilities. Modern Slavery risks, mitigation actions and any incidents are reviewed at least annually as part of the Group's enterprise risk management framework and are escalated to the Board where appropriate.

Oversight of Modern Slavery and Human Rights forms part of the Group's wider ESG governance framework, and is reported to the ESG Committee, ensuring a consistent and integrated approach to ethical conduct, risk management and transparency across environmental, social and governance priorities.

Our employees

At heart, we are people business. We see beyond just doing a job, it's about genuine care and real connections. We set the highest standards and are committed to ensuring that the human rights of our employees are protected.

In addition to being on the list of the Sunday Times 25 'Best Big Companies to Work For', and on the Social Mobility Index of the top 75 employers in the UK for our commitment

to social mobility, we are proud to have secured a number of other people focused accreditation and awards, to include:

- RoSPA Order of Distinction
- Social Mobility Index
- FTSE4Good
- ICS Service with Respect
- Social Value Management Certification
- EX Inclusive Culture Pledge
- Diversity Development Standard (silver)
- Mind Wellbeing Index (silver)

To ensure that our people are always at the forefront of our strategic decision making and corporate culture, we have created a national Workforce Group which is responsible for setting the approach to staff engagement.

We are also very proud to have an Employee Director who sits on the Mears Group Board, to ensure that the views of the workforce are not only voiced but listened to and actioned. This open and frank communication process is further enhanced by the comments and feedback supplied via the annual Sunday Times Best Companies survey, which is provided on an independent and anonymous basis.

Our approach to recruitment

Our Internal Recruitment team manage all employee recruitment and ensure that we carry out appropriate checks to ensure that employment is chosen freely, wages are compliant with the UK minimum wage, working hours are not excessive and any new applicant is suitable for the role for which they have applied.

All our employees undergo identity and right to work checks prior to commencing employment. We also carry out reference checking and Disclosure and Barring Service checks.

We make job offers subject to appropriate satisfactory vetting procedures (where

required). We employ most of our people directly allowing us to ensure that payment of salary is made direct to that person.

We have implemented a number of robust policies designed to reflect our corporate values and ensure that modern slavery and human trafficking does not occur within our group operations, key examples of which are detailed below:

- Recruitment
- Approach to Labour Standards Compliance
- Anti Fraud and Bribery
- Labour Standards Background Check
- Preventing engagement of Child Labour
- Group Code of Ethic
- Pay and Bonuses
- Bullying and Harassment
- Fairness and Inclusion

We address any failures by our employees to adhere to our Corporate Values and Ethical Code. This may involve disciplinary action, up to and including termination of employment and referral to appropriate third party stakeholders.

Our employees are instructed and encouraged to report any concerns they have regarding employee relations, recruitment, conduct etc. Such matters can be raised via an employee's line manager, our Employee Director, or anonymously via our Whistle Blowing process and procedure. Further information regarding our approach to Whistleblowing can be accessed below:

- Whistleblowing: [Whistleblowing Policy | Governance | Mears Group PLC](#)

Our approach to our suppliers

We have a zero-tolerance to modern slavery and human trafficking across our supply chain.

Our suppliers are sourced through a robust due diligence process, and the Group seeks

to ensure that those providing goods or services to or on our behalf act in line with our values and expectations in respect of ethical conduct and human rights.

All contractors are required, as part of our onboarding process, to confirm in writing their compliance with applicable anti slavery and human trafficking legislation and statutory codes of practice. Our ongoing supplier management process requires relevant documentation to be reviewed and updated annually, and we expect contractors to monitor and manage compliance within their own subcontractor and supplier networks in line with our guidelines.

Our established supplier controls include:

- ▶ Supplier approval processes
- ▶ Supplier contractual commitments
- ▶ Ethical sourcing of materials
- ▶ Framework agreements

If a contractor or supplier fails to act in a manner consistent with our expectations or their legal or contractual obligations, we look to work with them to resolve the issue to improve the situation of the people affected. If a serious breach is found and no corrective action is taken, we reserve the right to terminate contracts and refer their conduct to the appropriate authorities.

All of our suppliers are informed of and have access to our Whistleblowing process and procedures and are instructed and encouraged to make disclosures about any concerns they may have, to include modern slavery and human trafficking.

Supplier engagement and due diligence

In addition to our contractual and onboarding controls, we actively engage with suppliers to better understand and assess modern slavery and human trafficking risks within our supply chain.

Since the last Statement was published, supplier engagement meetings were held. Meetings were conducted virtually and enabled the Group to gain insight into supplier practices, identify areas of good practice, and agree follow up actions where appropriate.

Suppliers that are required to comply with Section 54 of the Modern Slavery Act are asked annually to confirm that:

- ▶ they have an anti slavery and human trafficking policy in place;
- ▶ they provide an appropriate mechanism for stakeholders to raise concerns; and
- ▶ they have complied with their obligations to prepare and publish a Modern Slavery Statement.

Suppliers are also asked to disclose any known instances of modern slavery or human trafficking identified within their business or supply chain.

Working collaboratively with suppliers in this way strengthens transparency, supports continuous improvement and helps the Group to better identify, manage and mitigate modern slavery risks within both our supply chain and that of our suppliers.

Due diligence and engagement for internal and supplier focused modern slavery and human trafficking

As part of our ongoing duty to identify and mitigate risk we have in place systems and processes to:

- ▶ Regularly monitor labour and payroll;
- ▶ Include the Act requirements as part of our procurement process clear set out our expectations;
- ▶ Build strong relationships with our supply chain and make clear the Group's expectations as to their conduct;
- ▶ Regular reviews with primary suppliers;
- ▶ Protect and support any whistleblowers; and

- ▶ Identify and assess potential risk areas in our supply chains and put in place actions to mitigate those risks.

Our central HR and procurement functions assist us to have visibility and a better understanding of the risk areas.

Training

Modern Slavery awareness forms part of the Group's mandatory training framework. All new colleagues are required to complete Modern Slavery training as part of their induction, ensuring a consistent baseline understanding of the risks of modern slavery and human trafficking and the role individuals play in preventing it.

The Group is committed to maintaining awareness over time and will implement a regular refresher programme on an annual basis, with enhanced training provided to managers and colleagues in higher risk roles, including those involved in procurement, supplier management and operational delivery. Training content is kept under review to ensure it remains relevant to the Group's risk profile and regulatory expectations.

Responsibilities

The Chief Executive Officer is the main individual Board director with primary responsibility for implementing this Statement within our wider framework for managing corporate responsibility. Compliance with the Act is reported to the Audit Committee annually.

Pursuant to the Act, we will update and issue this Statement (which for the purposes of the Act should be seen as our modern slavery and human trafficking statement) annually, to confirm the actions taken to ensure that slavery and human trafficking is not taking place in Mears or within the activities of the Group's supply chain.

Commitments and future progress

The Group recognises that addressing modern slavery and human trafficking requires continuous improvement. Over the coming reporting period, we will further strengthen our approach through a number of targeted actions.

These include enhancing supplier screening and due diligence, with a particular focus on higher risk sectors and geographies, and expanding the use of supplier audits and engagement activities to provide greater assurance over labour standards and working conditions. Where appropriate, we will also explore the use of worker voice mechanisms, such as surveys or feedback channels, to help identify potential risks within our supply chain.

The Group also intends to develop and implement a formal remediation framework, setting out clear steps for responding to identified issues, engaging with suppliers to drive improvement, and supporting affected workers where concerns are identified. Progress against these commitments will be monitored through established governance arrangements and will inform future disclosures.

We are proud of the steps that Mears has taken so far to address modern slavery and human trafficking. We recognise however, that this is an area which requires continual monitoring and improvement and we will continue to do this.

Targets for the next period – assessing our effectiveness of our actions

Following the introduction of the Compliance Committee onto the modern slavery and human trafficking governance process, we will be preparing enhanced internal reporting criteria designed to more fully demonstrate our performance, to include benchmarking against industry standards and other relevant guidance

Approval

The Board of Mears has been briefed on the Act, and in respect of how Mears has responded to the Act since it was enacted.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 December 2025.

This statement has been approved by the Board of Mears Group PLC and each of its relevant subsidiaries. It was approved by the Board on 2 June 2026.



Lucas Critchley Chief
Executive Officer