

EMPIRIC SOLUTIONS LIMITED

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2025

1. Introduction

This statement is made by Empiric Solutions Limited (Empiric) under section 54 of the Modern Slavery Act 2015. It describes the steps taken during the financial year ended 31 December 2025 to prevent modern slavery and human trafficking in Empiric's business and supply chains.

Empiric has a zero-tolerance approach to modern slavery, forced labour, servitude and human trafficking. We expect the same high standards from those who work for, with or on behalf of us.

2. Our business and supply chains

Empiric is a technology and transformation recruitment business specialising in data, digital, cloud and security. We provide permanent and contract recruitment services to clients seeking technology and change professionals.

Empiric operates principally in the United Kingdom, with employees in the United States, Germany and the Netherlands. Our supply chain includes recruitment and labour-supply relationships, professional advisers, technology and business-service providers and other suppliers supporting our operations.

3. Policies and governance

Our approach is supported by our Whistleblowing, Sustainability, Health and Safety and Anti-Bribery policies, together with our recruitment, right-to-work, supplier onboarding and ethical-business controls. These policies and controls are designed to promote lawful, ethical and responsible business conduct.

Staff and other stakeholders are encouraged to raise concerns through management or our whistleblowing arrangements. Concerns are handled in accordance with the relevant internal procedures.

4. Risk assessment and due diligence

Empiric assesses modern-slavery risks across its operations and supply chains on a proportionate, risk-based basis. In doing so, we consider relevant factors including the nature of the service, the

location of the activity, the use of labour, the sector concerned and information available about suppliers and other business partners.

Our assessment identifies recruitment and labour-supply activity as an area requiring continuing attention. We also recognise that risk can arise through indirect procurement and supporting services. While we assess the inherent risk in our business and supply chains to be low, low risk does not mean no risk.

When onboarding relevant suppliers and labour-supply partners, Empiric seeks information about their policies and controls, including those concerning modern slavery, human trafficking, forced labour, human rights and whistleblowing. Where concerns arise, we may seek further information and undertake proportionate checks. Authority to establish higher-risk commercial relationships is restricted to appropriately trained senior staff.

5. Training and awareness

Relevant staff receive modern-slavery awareness information appropriate to their role. This is intended to help them recognise potential indicators of exploitation and understand how to escalate a concern. Relevant policies and reporting routes are available through the employee handbook and intranet.

6. Monitoring and continuous improvement

Empiric monitors the operation of its controls using appropriate indicators, including completion of relevant awareness activity, right-to-work and identity checks where applicable, supplier due-diligence activity and concerns raised or escalated. Any suspected issue is assessed and escalated under applicable internal procedures.

During the next reporting period, Empiric will continue to review its risk assessment, due-diligence arrangements and awareness activity, with particular focus on recruitment and labour-supply relationships.

Empiric will review this statement annually. The approved statement will be published prominently on Empiric's website and may also be submitted to the UK Government Modern Slavery Statement Registry.

7. Approval

This statement was approved by the board of directors of Empiric Solutions Limited on 01/01/2026 and is signed on its behalf by:

Sam Kamyar



01/01/2026