

Modern Slavery and Human Trafficking Policy

Gemrick Limited

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| Policy owner | John Sweeney |
| Approved by | The Board of Directors, Gemrick Limited |
| Date of issue | 10 May 2026 |
| Financial year covered | Year ending 31 March 2026 |
| Review date | Annually, or sooner if circumstances change |

1. Introduction and policy statement

Gemrick Limited (“the Company”, “we”, “our”) is committed to combatting slavery, servitude, forced or compulsory labour, and human trafficking (together, “modern slavery”) in every part of our business and supply chains. This policy is issued in support of compliance with the Modern Slavery Act 2015 and the wider expectations of our customers, including UK public sector buyers.

This statement relates to the financial year ending 31 March 2026. Although our turnover is below the £36 million threshold at which a statutory modern slavery statement is required, we voluntarily publish this policy because:

1. Exploitation within any supply chain ending in the UK is a blight on our society, and we are committed to playing our part in eliminating it; and
2. Our customers with obligations under the Modern Slavery Act 2015 cannot meet those duties without our cooperation.

This policy applies to all persons working for or on behalf of Gemrick Limited in any capacity, including employees at all levels, directors, officers, agency workers, contractors, consultants and business partners.

2. Our business and supply chain

Gemrick Limited is a UK-based consulting business operating as a limited group. We operate exclusively in the United Kingdom. Our supply chain is relatively short and consists of:

- UK-based suppliers of office supplies, IT equipment and software;
- Subcontractors and freelancers engaged on a project basis;
- Providers of professional services, including accounting, IT, legal and insurance;
- Utilities and telecoms providers.

The majority of our suppliers are based in the UK and are themselves subject to UK law, including the Modern Slavery Act 2015. We consider the risk of modern slavery within our direct supply chain to be low. We recognise, however, that risk can exist at lower tiers of the supply chain that are less visible to us, particularly where goods or raw materials originate from higher-risk regions or sectors such as textiles, electronics, agriculture or construction.

3. Policy provisions

This policy, applied across our domestic and global supply chains as well as our own operations, expressly includes the following provisions in relation to modern slavery. Any breach is treated as a serious matter and may result in

disciplinary action up to and including dismissal, termination of supplier relationships, and referral to the relevant authorities.

3.1 Freedom of workers to terminate employment

- **Freedom to terminate employment** – All workers engaged by Gemrick Limited or by any organisation in our supply chain must be free to terminate their employment or engagement at any time, on reasonable notice, without penalty and without any form of financial deduction beyond what is lawfully agreed. We do not tolerate any practice that traps workers in employment, including the withholding of wages, deposits or benefits to discourage resignation.

3.2 Freedom of movement

- **Freedom of movement** – Workers must have full freedom of movement during and outside working hours. We prohibit any practice that restricts a worker’s ability to leave the workplace, accommodation provided in connection with work, or the country in which they are working, including the use of locked premises, curfews not justified by genuine safety reasons, or surveillance designed to control movement.

3.3 Freedom of association

- **Freedom of association** – We respect the right of all workers to join, form or refrain from joining a trade union or other workers’ representative body of their own choosing, and to bargain collectively, without fear of reprisal, intimidation or harassment. Where this right is restricted by law, we support parallel means of independent and free association and bargaining.

3.4 Prohibition of violence, harassment and intimidation

- **No threat of violence, harassment or intimidation** – We prohibit all forms of physical, verbal, sexual, psychological or financial violence, harassment, bullying, intimidation, coercion and abuse. This applies to managers, colleagues, suppliers, recruitment agents and any third party acting on our behalf or within our supply chain.

3.5 Prohibition of worker-paid recruitment fees

- **No worker-paid recruitment fees** – In line with the Employer Pays Principle, no worker should pay for a job. We prohibit the charging of recruitment fees, deposits or related costs (including fees for travel, visas, medicals, training or equipment necessary to commence work) to workers, whether directly or indirectly, and whether by us or by any recruitment agent or supplier acting on our behalf or within our supply chain. Where any such fees are identified as having been charged, they must be repaid to the worker in full.

3.6 Prohibition of compulsory overtime

- **No compulsory overtime** – All overtime must be voluntary, agreed in advance, properly recorded and paid at the applicable premium rate. Workers must not be required, threatened or pressured into working overtime, and must not be penalised for declining to do so. Working hours must comply with applicable law and, in any event, must allow for adequate rest.

3.7 Prohibition of child labour

- **No child labour** – We prohibit the employment of children. No person under the age of 15 (or under the local minimum working age, or the age of completion of compulsory education, whichever is highest) may be engaged in any operation or supply chain associated with Gemrick Limited. No person under the age of 18 may be engaged in hazardous work or in work that interferes with their education, health, safety or development.

3.8 Prohibition of discrimination

- **No discrimination** – We prohibit discrimination, harassment or victimisation in recruitment, terms of employment, training, promotion, discipline or termination on the basis of any protected characteristic, including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, nationality, ethnic or national origin, trade union membership, political opinion, or any other status protected by applicable law.

3.9 Prohibition of confiscation of identification documents

- **No confiscation of original identification documents** – Neither Gemrick Limited nor any organisation in our supply chain may retain, confiscate, destroy or deny access to any worker’s original identification or travel documents, including passports, identity cards, work permits or residency documents. Where the genuine inspection of an original document is required (for example, for right-to-work checks), the document must be returned to the worker immediately after inspection.

3.10 Access to remedy, compensation and justice

- **Access to remedy, compensation and justice** – We are committed to providing access to effective remedy for any victim of modern slavery identified in our operations or supply chain. This includes confidential reporting channels (including our whistleblowing procedure), prompt and impartial investigation of concerns, cooperation with law enforcement and victim-support organisations such as the Modern Slavery and Exploitation Helpline (08000 121 700), reimbursement of any unlawfully charged fees, payment of unpaid wages, and support to enable victims to access compensation, healthcare and justice without retaliation.

4. Due diligence and supplier expectations

We have examined our own business and, so far as it is reasonably practicable, the businesses within our supply chain. On that basis we confirm that:

- Within our own business, no relevant offence relating to slavery or human trafficking has been committed;
- We have made enquiries of businesses that supply directly to us and we are satisfied that no relevant offence is being committed in those businesses;
- Insofar as it has been reasonably practicable, we have examined our supply chains and have found no evidence of slavery or human trafficking. Where any concern is identified, we will take steps to alter our supply chain and will keep the matter under review.

We expect every supplier, subcontractor and business partner to comply with the provisions set out in section 3 of this policy, to apply equivalent provisions to their own suppliers, and, where they are in scope, to publish their own modern slavery statement. Where it is reasonably practicable, we ensure that businesses in our supply chain have made a similar statement relating to slavery and human trafficking.

5. Responsibility, training and reporting

The Board of Gemrick Limited has overall responsibility for ensuring that this policy complies with our legal and ethical obligations. The person within the business responsible for assessing and managing matters relating to slavery and human trafficking is:

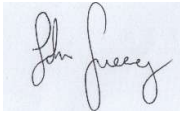
John Sweeney – john.sweeney@datagardener.com

All employees, contractors and workers are required to read and comply with this policy. We provide guidance to employees on identifying the signs of modern slavery and on the steps to take if any concern is raised.

We encourage all employees, suppliers and other stakeholders to report any concern relating to modern slavery in our operations or supply chain. Reports may be made to the policy owner above. Concerns may also be reported externally to the Modern Slavery and Exploitation Helpline on 08000 121 700. No person making a report in good faith will suffer any detriment as a result.

6. Review

This policy is reviewed at least annually and updated as necessary to reflect changes in our business, our supply chain, applicable law and best practice. It has been approved by the Directors.

A handwritten signature in black ink on a light blue rectangular background. The signature appears to read "John Sweeney".

Signed:

John Sweeney Director, Gemrick Limited

Date: 10 May 2026