



Modern Slavery and Human Trafficking Statement

S&W Partners Audit Limited

Introduction

This statement on Modern Slavery and Human Trafficking pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) is made on behalf of S&W Partners Audit Limited (the “Company”) for the financial year ended 31 December 2025.

Organisation

The Company provides audit and related compliance services to corporate entities, professional practices and not-for-profit organisations. The Company has independent control and governance arrangements but works alongside S&W Partners Group Limited and its subsidiaries (the “Group”), which provides a range of other accounting services including taxation and financial advice to the extent that it is appropriate and in line with ethical and independence guidance. The Company and the Group are closely connected, and in practice adhere to a number of identical policies, statements and procedures. The Company procures the majority of the services it requires, including the provision of human resource, from the Group and therefore the Group supply chain and controls apply to the Company. Accordingly, this statement includes descriptions of the Group’s processes and controls in relation to Modern Slavery and Human Trafficking that also impact the Company. The Group has offices in the UK.

Supply Chain

The Company only operates in the UK, however, the Group has services provided by suppliers globally, including but not limited to, India, US, Germany and Switzerland. Due to the nature of its operations, the Group has assessed it is at low risk of slavery or human trafficking in the Group’s business and supply chain.

The Group’s supplier and outsourcing arrangements include information technology service providers, facilities management, professional services firms or other providers who are themselves regulated entities, for example legal or audit services.

However, the Group has taken steps to protect against modern slavery risks by reviewing evidence from suppliers of their modern slavery assessments and policy, during the tender and due diligence process. The Group also asks new suppliers to abide by the Group’s Supplier Code of Conduct. The Group’s procurement policy has modern slavery assessments integrated into the Group’s procedures. During the tender process the Group requires confirmation that the supplier complies with the Act and requests evidential proof of their policy or statement. In 2024, the Group carried out an assessment of Environmental, Social and Governance (ESG) themes, including Modern Slavery, amongst its suppliers. As a result, on a risk-based approach, the Group requires suppliers with a higher exposure to modern slavery risks to confirm they have a Modern Slavery policy, controls to manage the risks related to modern slavery, and monitoring and reporting procedures in place including but not limited to whistleblowing procedures. The exposure of the suppliers is assessed on the basis of the nature of products,

services the Group procures and the geographic location of the suppliers. Based on the exposure and the associated risk assessment, the level of due diligence is determined and initiated.

The Group's due diligence process additionally requires verification that suppliers have policies for their workers and contractors regarding fair treatment and pay of workers and contractors, adequate whistleblowing procedures and that those employed in the provision of services have the necessary documentation to legally work in the UK. The Group expects its suppliers to implement due diligence procedures for their permitted direct subcontractors, and suppliers and other participants within their supply chain. This further assists the Group to ensure that the risk of slavery or human trafficking is appropriately assessed and managed in its supply chain. An annual due diligence review takes place for the Group's material outsourcing arrangements, and this requires confirmations that suppliers have taken steps to ensure that their supply chain is free from any modern slavery.

The Group also monitors its own procurement practices and policies annually to align with the modern slavery best practices.

Employees

The Company and the Group are committed to ensuring that modern slavery and human trafficking do not take place within the workforce. The Group, which provides human resource services to the Company, operates a zero-tolerance approach to all forms of modern slavery, including slavery, servitude, forced or compulsory labour, and human trafficking.

This commitment applies to all individuals working for, or on behalf of, both organisations in any capacity.

The Group has robust recruitment and onboarding processes in place to help mitigate the risk of modern slavery. The recruitment process includes right-to-work checks and identity verification procedures to ensure that individuals are legally entitled to work and are not subject to forced, bonded, or involuntary labour.

The Company and the Group both encourage an open and transparent culture in which concerns can be raised safely. Confidential reporting channels and whistleblowing procedures are in place to enable individuals to report concerns in good faith and without fear of retaliation. In addition, the Group's internal policies require colleagues to report any suspicion to the Money Laundering Reporting Officer. The Company and the Group are committed to investigating and addressing any concerns promptly and appropriately, and to upholding the human rights and dignity of all individuals connected to our organisation.

Monitoring and training

As mentioned above, annual due diligence review and re-assessment take place for the Group's material outsourcing arrangements.

Mandatory modern slavery computer-based training is completed by all of the Group's colleagues, including those acting for and providing services to the Company, and is issued annually. This online module is designed to promote awareness and enables staff to recognise the signs of modern slavery in the workplace and the Group's supply chain. The training on Modern Slavery is reviewed annually.

The Group's Whistleblowing Policy encourages and enables staff to raise any concerns, confidentially. Contractors working on the Group's premises also have the right to protection under this policy.

This statement has been approved by the Board.

For and behalf of the Board:



Andrew Bond

Director

Date: 26 March 2026