

COMMERCIAL SERVICES GROUP MODERN SLAVERY STATEMENT

FOR YEAR ENDING MARCH 2026

This Statement is made on behalf of Global Commercial Services Group Limited ('CSG', 'the Group'), all its subsidiary entities, joint ventures and trading brands and all activities for which CSG has responsibility for delivery across all sites occupied by the Group and its joint venture organisations, pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes our modern slavery and human trafficking statement for the year ending 31 March 2026.

CSG is committed to preventing modern slavery and human trafficking within its operations and supply chains. The Group take a zero-tolerance approach to all forms of modern slavery and are committed to implementing effective systems, controls and due diligence processes to identify, prevent, mitigate and address modern slavery risks.

Section 1: About CSG

Organisation Structure

Commercial Services Group is a trading style of Global Commercial Services Group Ltd (Reg No 1173561), a company registered in England and Wales, with its ultimate parent organisation being Kent County Council.

CSG is a supplier and broker of products and services in the UK and across the world. It is pre-eminent in the supply of goods and services to the public sector as well as private sector customers and international schools.

Goods and services procured by CSG

There are a range of goods, services, and works which are procured across the group and broadly fall into the following category headings below.

Provision of Frameworks for use by the wider public sector

The principal framework categories include:

- Energy
- Recruitment

- Banking & Finance
- Construction
- Education
- Emergency Services
- Facilities
- Fleet
- Health & Social Care
- Office
- People & Professional Services
- Property Management
- Technology

Energy and decarbonisation services

Our Energy and Carbon division produces and sells energy and decarbonisation services to the public and private sectors.

Technology purchases

These purchases cover everything from ICT consumables through to ICT network solutions.

Recruitment Services Joint Ventures

These manage frameworks to support the compliant recruitment of temporary and permanent staff across the public sector.

Community Services

This operates as an integrated outdoor services provider. Its value chain begins with the procurement of landscaping materials, plants, equipment, vehicles and specialist services, flows through its operational workforce and site management activities, and ends with maintained landscapes, sports facilities, trees and public spaces for customers across local government, education, commercial property and agricultural sectors. A strong emphasis is placed on sustainability, responsible sourcing, waste reduction and carbon reduction throughout the supply chain.

Global Educational Supplies

Our Global Education Supplies division delivers an extensive range of products and services to nurseries and schools in the UK and internationally.

Our catalogue offers more than 26,000 products, spanning education resources, office supplies, facilities management products, furniture, outdoor learning equipment, and site maintenance essentials.

The organisation operates a hybrid supply chain model that combines warehouse-stocked products distributed through its own fulfilment network, direct-to-customer deliveries from approved manufacturers and suppliers, and framework agreements that pre-qualify suppliers and support compliant public sector procurement.

All suppliers are subject to a competitive evaluation process before being appointed, helping to ensure value, compliance, and service quality.

Due to the global nature of the business, our supply chain in this area is global via our strong partnerships with world-leading suppliers. These products are ethically sourced and compliant with safety standards.

CSG also sources selected own-brand products from both UK and international markets, including China, India, Taiwan, and countries within the EU. As a result, supply chain due diligence forms a key part of our procurement approach, supported by a Supplier Sourcing Code of Practice (SCOP) that sets expectations around ethical and responsible sourcing.

Section 2: Modern Slavery Policies

The Modern Slavery Procurement Policy Note (PPN) 009 has been fully implemented by CSG within its procurement processes and documents.

Examples of the controls implemented include:

Policies and Procedures

CSG operate the following policies that describe the standards of conduct that is expected from employees in the Group.

- **Employee Code of Conduct and Ethics Policy:** Our Code of Conduct outlines the standards of behaviour, values, and principles expected from all colleagues across CSG. All colleagues are expected to uphold the highest standards of ethics and integrity in every aspect of their work. This includes acting honestly, transparently, and responsibly in all decisions and interactions, whether internal or external.
- **Procurement Policy:** Our Procurement Policy includes statements on modern slavery and ethical procurement practices plus requirements expected of Supply Chain and Contract Managers in contract management activities. The Procurement Policy reiterates that any breach by the supplier in regard to their modern slavery obligation shall be deemed a material breach of our agreement and shall entitle the Authority to terminate the agreement with immediate effect. It also advises the procedure for reporting any suspicions or concerns.
- **Whistleblowing Policy:** CSG encourages all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Internal Communications

The following resources have been made available to staff via the CSG intranet:

- Modern slavery guidance
- Quick reference guide: tackling modern slavery

The procurement process flow that is available to all members of the group contains documents and templates that are made available at the appropriate point in the commercial lifecycle.

These documents include

- Modern Slavery Assessment Tool (MSAT)
- Contract tier descriptions to support the MSAT
- Example contract clauses for use in our contracts
- Access to the supplier's assessment portal
- Example evaluation questions, contract management and KPIs
- Supplier audits points to consider
- Remedial Action Plan template

Where applicable, the following example questions are evaluated via our tender process:

- Evidence of compliance with all applicable labour/employment laws in delivering the contract.
- Provision of training on modern slavery for employees and personnel with responsibility for supply chain management in respect of the workers and supply chain that will deliver the contract.
- Identification of sourcing geographies where suppliers will deliver services or manufacture goods for the contract where there is a high risk of modern slavery.
- Number of workers employed and on what basis (e.g. direct, agency staff etc.) to deliver the contract.
- Workers who will deliver the contract are aware of their rights and have employment contracts in place.
- Evidence that no worker who will deliver the contract has had to pay for employment.
- Evidence that passports of the workers who will deliver the contract are not retained.
- Evidence that workers who will deliver the contract are free to join a trade union/collective agreement.
- If an effective whistleblowing/grievance mechanism is in place for workers and supply chain workers who will deliver the contract.
- How recruitment policy prohibits the practice of worker-paid recruitment fees, e.g. adoption of the Employer Pays Principle, a policy of no worker-paid recruitment fees in relation to any worker who will deliver the contract.

Section 3: Risk Assessment and Action Plans

The Group's suppliers have supply chains that are global, providing direct and indirect support to the delivery of requirements.

As with many organisations operating within complex global supply chains, the Group does not have complete visibility beyond certain tiers of its supply chain. To address this challenge, we apply a risk-based approach that prioritises enhanced due diligence, supplier engagement and assurance activities in higher-risk sectors, geographies and contracts.

Risk Management Framework (RMF)

The Group's RMF underpins our procurement policies, ensuring modern slavery risks are identified, assessed and appropriately mitigated.

Modern slavery is captured under the following strategic risk themes

- Compliance with legal / regulatory requirements
- Supply chain performance, resilience & agility
- ESG, social & sustainable value

An action plan to manage any risks identified across the commercial lifecycle is developed and used throughout the procurement process.

1: Group MSAT

The Group undertook a high-level Modern Slavery Assessment Tool (MSAT) review across its business units to identify areas where there may be an increased risk of modern slavery within operations and supply chains.

The assessment considered factors such as the nature of goods and services procured, geographic sourcing locations, supply chain complexity, and the potential use of labour-intensive activities. This enabled the Group to adopt a risk-based approach to understanding and prioritising areas requiring enhanced due diligence and ongoing monitoring.

The review identified a number of business activities that warranted additional scrutiny due to factors such as international sourcing arrangements and areas of the business that rely on significant workforce engagement. These findings have informed the Group's ongoing modern slavery risk management activities.

2: Group Organisation MSAT and Supplier Questionnaires

The Group also utilised supplier questionnaires and modern slavery assessments to enhance visibility of risks within its supply chain.

The assessment process provided valuable insight into supplier practices and identified opportunities to further strengthen controls relating to supply chain due diligence, responsible purchasing practices, and the management and reporting of modern slavery concerns.

The findings have been used to support engagement with suppliers, inform contract management activities, and shape future improvement initiatives across the Group's supply chain assurance programme.

As a result of the assessment process, the Group:

1. Reviewed existing contracts and procurement activities to better understand modern slavery risks across its operations and supply chains.
2. Undertook enhanced due diligence and supplier engagement activities where elevated risks were identified.
3. Carried out supplier assurance activities, including site visits and audits where appropriate, using modern slavery guidance and best practice principles.
4. Incorporated supplier improvement actions into ongoing contract management and supplier relationship management processes.
5. Continued to strengthen procurement guidance, due diligence procedures, and supplier assurance arrangements across the Group

Supply chain responsible recruitment practices

The Group ensures that both its own recruitment practices are robust, and, when awarding contracts, the supply chain is also implementing robust recruitment practices.

CSG require all suppliers to demonstrate their commitment to eliminating modern slavery, through recruitment policies and procedures. This involves suppliers evidencing how they select sub-contractors and that the commitment to eliminate modern slavery also flows down through their supply chains.

The contractual terms state that they are required to inform CSG immediately if they suspect or become aware of any breaches in their supply chain. Failure to inform of what becomes a proven breach will result in removal from the CSG supply chain.

Supplier due diligence and management

The Group has implemented a Supplier Management Matrix which sets out, based on the type of contract, the due diligence activities required both prior to award and as part of ongoing contract management to provide assurance of the compliance of the supply chain. This includes the requirement to request evidence of the supplier's modern slavery statement, completion of an MSAT assessment and supplier questionnaire, where applicable.

Contract management guidance is also made available via the CSG intranet. This provides practical information on what good contract management looks like throughout the supplier lifecycle, including

approaches to performance monitoring, relationship management, and risk mitigation. The resource also outlines how Key Performance Indicators (KPIs) can be developed and utilised to measure supplier performance, promote accountability, and drive continuous improvement.

If the MSAT highlights higher potential for modern slavery risk, model modern slavery evaluation questions are utilised in tenders and suppliers requested to complete a questionnaire. Suppliers that fail to provide the required information or demonstrate satisfactory compliance with our modern slavery requirements may be excluded from the procurement process or subject to further review before appointment.

Where possible, CSG uses the Government Standard Contracts for Procurement. Our contract terms contain model modern slavery clauses that specify the supplier's contractual obligations including key performance indicators monitored by our contract managers.

Quality Assurance

The Corporate Procurement function undertakes quality assurance reviews to audit compliance with procurement and supplier management standards including those relating to modern slavery. These reviews help identify areas of good practice, highlight opportunities for improvement, and provide assurance that established processes are being followed.

Incident Reporting

CSG encourages both suppliers and our staff to report any incidents or suspicions of modern slavery.

In the year ending 31 March 2026, no allegations, incidents or suspected cases of modern slavery or human trafficking were reported through the Group's reporting channels.

Section 4: Training and Awareness

The Corporate Procurement function delivers regular training and awareness sessions for staff covering a wide range of topics, including modern slavery, and makes guidance available via the CSG intranet. Staff are made aware of ethics training available from CIPS as well as the e-learning modules available via the Government Commercial College website.

Section 5: Goals and Next Steps

Progress against 2025/6 goals

Detailed below are the goals that the Group set to strengthen how it tackled modern slavery in 2025/26 and progress against these:

Goal 1

- Raise the awareness of the MSAT risk identifier to the Group.

- **Achievement:** Internal training sessions delivered and guidance published on intranet to promote awareness of the MSAT.
- Review and assure a sample of contracts let in the previous 12 months for modern slavery risk confirmation.
 - **Achievement:** Overarching Group MSAT undertaken to identify medium and high-risk areas.
- Implement contract tiering to support a risk-based approach.
 - **Achievement:** Contract tiering embedded into procurement and contract management activities.

Goal 2

- Ensure that contract management assessment of supplier improvement actions is embedded.
 - **Achievement:** Supplier questionnaire improvement actions being utilised to inform contract management approaches and conversations.

Goal 3

- Align supplier onboarding processes across the Group.
 - **Achievement:** Group-wide supplier set-up form and process implemented alongside a Supplier Management Matrix which sets out due diligence required.

Goal 4

- Continue to hold modern slavery internal training sessions and signpost teams to CIPS ethic test and to the GCC e-learning course.
 - **Achievement:** Intranet page set up covering Modern Slavery with links to further information and templates. Alongside this, the Corporate Procurement Team hold regular training events to raise awareness of modern slavery risk and both how robust procurement practices can support prevention and how to deal with any concerns should they arise.

Goal 5

- Ongoing assurance of modern slavery compliance via corporate Procurement.
 - **Achievement:** Quality assurance checks undertaken by the Corporate Procurement team to provide assurance of compliance. Findings, including any opportunities for improvement, are shared with business leads, and actions tracked.

Next steps for 2026/27

As part of our commitment to continuous improvement, the Group will focus on the following priorities during 2026/27:

Goal 1: Continue to strengthen supplier engagement and due diligence processes, using modern slavery assessments to promote improved transparency and risk management throughout our supply chain.

Goal 2: Further embed the Modern Slavery Assessment Tool (MSAT) and associated due diligence processes across all Group businesses to ensure a consistent and risk-based approach.

Goal 3: Increase awareness and understanding of modern slavery risks through ongoing training, guidance and engagement activities for colleagues involved in procurement, contract management and supplier oversight.

Goal 4: Expand supplier assurance activities, including site visits and audits where appropriate, to provide greater oversight of higher-risk suppliers and supply chain categories.

Goal 5: Continue to enhance the Group's procurement, contract management and supplier governance arrangements to support the identification, assessment and mitigation of modern slavery risks.

The Group recognises that preventing modern slavery requires ongoing vigilance and continuous improvement. Through the actions outlined in this statement, we will continue to strengthen our governance, supplier assurance and risk management arrangements, while promoting ethical and responsible business practices throughout our operations and supply chains.

Signatories

Chief Executive Officer: Rob Boyles
Date Approved: 21st September 2026

Chief Financial Officer: Andy Nash
Date Approved: 21st September 2026