

Modern Slavery Statement 2026

Date: 4th June, 2026 (published for the financial year ended 31 December 2025)

Introduction

At Strongbyte Solutions Limited and across our subsidiaries (the "Group"), it is our priority to trade ethically, source responsibly and actively prevent modern slavery and human trafficking within our organisation and across our supply chain. This statement sets out the steps we have taken during the financial year ended 31 December 2025 (the "Reporting Period") to prevent modern slavery and human trafficking in our business, supply chains, and our plans for continuous improvement.

This statement is published in accordance with section 54 of the Modern Slavery Act 2015 and has been approved by the Board of Directors of Strongbyte Solutions Limited.

Our Business

Our supply chain includes (among other things) providers of software development and IT services, cloud/hosting and telecommunications services, professional services, recruitment/contractor agencies, and manufacturers and distributors of wireless headset hardware and related components.

We consider the most salient modern slavery risk areas for our business to typically include: (i) outsourced labour (including contractors and temporary labour), (ii) hardware manufacturing and logistics (where lower-tier supply chains may be less transparent), and (iii) services supplied from higher-risk geographies or sectors. During the Reporting Period, we sought to mitigate these risks through risk-based actions including, for outsourced labour, requiring relevant labour providers to confirm right-to-work checks and compliance with applicable labour laws and conducting targeted spot checks where appropriate; and for hardware manufacturing/logistics, requesting additional lower-tier transparency from relevant direct suppliers (including, where appropriate, mapping of manufacturing sites and material subcontractors) and applying enhanced due diligence to suppliers assessed as higher risk. We keep this assessment under review and prioritise due diligence accordingly, and we aim to disclose quantitative outcomes of these activities in our measuring effectiveness reporting (for example, training completion rates for relevant roles, the number of suppliers subject to enhanced due diligence and corrective action plans, and the number of concerns raised and outcomes).

The principal activities of the Group are to develop an enterprise-wide team communication solution that enables retail colleagues to communicate instantly and

effectively to resolve customer and staff queries. These products and software services enable deskless teams to communicate using wireless headset devices and simultaneously receive automated or user-generated messages. Our products and software services have been developed by the Group and deployed to some of the world's leading retailers. The Group operates primarily in the UK, DACH and USA, and had around 200 employees as at 31 December 2025.

Risk Assessment and Management

Where we identify heightened modern slavery risk, we may apply enhanced due diligence measures such as requiring evidence of policies and training, mapping of material subcontractors, verification of right-to-work and labour practices, and/or corrective action plans with time-bound remediation.

We have a zero tolerance policy with regards to slavery and human trafficking. To assess and manage the risks of modern slavery, the Group applies a risk-based approach to due diligence across our operations and supply chains, informed by factors such as country risk, sector risk, the nature of labour used (including agency/temporary labour), and the extent of subcontracting and outsourcing. Our risk assessment includes:

- **Supplier Due Diligence and Audits:** Risk-based due diligence (including questionnaires, document review and, where appropriate, audits) to assess suppliers' compliance with our ethical standards and applicable laws.
- **Risk Mapping:** Identifying higher-risk areas and tiers within our supply chain (including subcontracting) and prioritising enhanced checks and engagement in those areas.
- **Stakeholder Engagement:** Collaborating with relevant stakeholders (including suppliers, customers and industry bodies where appropriate) to strengthen our understanding of risk and improve our approach.

Due Diligence Processes

If a potential modern slavery issue is identified, we aim to: (i) assess and safeguard any impacted individuals, (ii) engage the supplier to investigate and implement remediation, (iii) use leverage to drive corrective actions and monitor completion, and (iv) consider suspension or termination of the relationship where remediation is not possible or the supplier fails to cooperate, consistent with contractual rights and applicable law.

Our due diligence processes are integral to our efforts to combat modern slavery. These processes include:

- **Supplier Code of Ethics:** We require relevant suppliers to adhere to our Supplier Code of Ethics (or demonstrate equivalent standards), which prohibits forced labour, debt bondage, child labour and human trafficking.

- **Contractual Obligations:** Where appropriate, we include clauses requiring compliance with applicable anti-slavery laws, adherence to our Supplier Code of Ethics, rights to request information and audit/assurance, and obligations to notify us of any suspected or confirmed modern slavery issues in the supplier's operations or supply chain.
- **Monitoring and Reporting:** Ongoing monitoring proportionate to risk and clear reporting channels for employees and third parties to raise concerns, including suspected cases of modern slavery, including via our Whistleblower Policy process, and direct reporting to a line manager, HR, Procurement, or Legal/Compliance. Where legally permitted, reports may be made anonymously and we prohibit retaliation against anyone who raises a concern in good faith. During the Reporting Period, no concerns potentially related to labour practices/modern slavery were raised through these channels.

Training and Awareness

The Group believes that education and awareness are key to preventing modern slavery. We provide training to relevant staff to ensure they understand the risks and indicators of modern slavery and how to raise concerns. Our training programmes cover:

- **Identification of Modern Slavery:** Educating employees on how to identify signs of modern slavery.
- **Reporting Mechanisms:** Training staff on the procedures for reporting any concerns or suspicions.
- **Ongoing Education:** Periodic refreshers and updates for relevant teams (including procurement, people/HR and those involved in supplier onboarding and management) to reflect evolving risks and best practice.

Policies and Codes of Conduct

The Group has established a comprehensive set of policies to support our commitment to preventing modern slavery. These include:

- **Code of Conduct:** Our Code of Conduct outlines our ethical standards and expectations for all employees and partners.
- **Supplier Code of Ethics:** A detailed code that sets forth the requirements for our suppliers regarding labour practices and human rights.
- **Whistleblower Policy:** A policy that encourages employees and other stakeholders to report concerns (including modern slavery risks) without fear of retaliation, and which sets out how reports are handled and escalated.

Measuring Effectiveness

We recognise that modern slavery risks can be hidden in lower tiers of supply chains and that effectiveness measures will continue to evolve as we improve supply chain visibility and data quality.

To assess the effectiveness of our efforts, the Group uses measures including:

- Performance Indicators: Tracking indicators such as completion of relevant training, supplier onboarding checks completed, instances of supplier non-compliance identified, and the number and outcome of concerns raised through our reporting channels. For the Reporting Period ended 31 December 2025, we recorded:
 - (i) Training completion: 100% of employees in relevant roles (e.g., procurement, people/HR and supplier management) completed modern slavery training;
 - (ii) Supplier due diligence: 100% of new material suppliers completed onboarding due diligence; and
 - (iii) Concerns raised: zero concerns potentially related to labour practices/modern slavery were raised through our reporting channels.
- Regular Reviews: Conducting regular reviews of our policies and procedures to identify areas for improvement.
- Feedback Mechanisms: Soliciting feedback from employees, suppliers, and partners to enhance our strategies.

Conclusion

The Group is dedicated to maintaining a transparent and ethical business environment. We will continue to evaluate and improve our practices to ensure that modern slavery and human trafficking have no place in our operations or supply chains. We are committed to working collaboratively with all stakeholders to achieve this goal.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 December 2025. It was approved by the Board of Directors on 4th June 2026 and is signed by a director on behalf of Strongbyte Solutions Limited.



R S Gamlin

Director

Strongbyte Solutions Limited