



Modern Slavery and Human Trafficking Statement (FY2025/26)

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that Focus Group and its affiliated companies have taken, and are continuing to take, to ensure that modern slavery and human trafficking are not taking place within our business or supply chain.

Focus Group has a zero-tolerance approach to any form of modern slavery, forced labour, or human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings, and to maintaining effective systems and controls to prevent any form of modern slavery within our business or supply chain.

This statement has been approved by the Board of Directors and covers the financial year ending November 2026. It applies to Focus Group and all subsidiary and affiliated companies listed in the Schedule at the end of this statement.

Our Business and Structure

Focus Group is a leading UK communications and technology services provider. We operate across a broad portfolio of divisions including Voice, Mobile, IT, Data, Media, Print, Security and Energy, serving business customers of all sizes throughout the UK.

We employ approximately 1,300 people across 21 UK locations. We have grown significantly in recent years through both organic growth and strategic acquisitions, and our annual turnover exceeds £210m. As part of our ongoing integration programme, we are committed to ensuring that our standards and controls; including those relating to modern slavery, are consistently applied across all acquired entities and new business lines.

We are an equal opportunities employer, committed to creating and maintaining a non-discriminatory, inclusive and respectful working environment for all employees. We are committed to fair employment practices and compliance with all applicable employment laws as a minimum standard.

Our Supply Chains

Our supply chains span a range of goods and services necessary to deliver our portfolio of products and services to customers. These include telecommunications hardware

and software, IT infrastructure, managed services, professional services, logistics, facilities management, and corporate services.

We seek to develop and sustain trusted, long-term relationships with our suppliers. Working with integrity is central to all supplier relationships. We are aware that supply chains carry inherent risk in relation to modern slavery, particularly where goods or components are sourced internationally or through multi-tier supply chains. We take a risk-based approach to identifying and managing these risks.

We require all suppliers to provide us with a modern slavery and human trafficking statement as a condition of doing business with Focus Group. Where suppliers are unable to provide this, we will engage with them to understand their position before deciding on whether to proceed.

Our Policies

We operate several internal policies that support our commitment to conducting business ethically and transparently. These policies set out the standards expected of our employees, contractors and suppliers, and include processes through which concerns about modern slavery can be reported. Key policies include:

1. **Recruitment Policy:** We operate a robust recruitment process, including right to work in the UK verification for all employees, to guard against human trafficking and forced labour. We use reputable recruitment agencies and labour providers only, requiring them to confirm their own compliance with applicable laws.
2. **Whistleblowing Policy:** All employees are encouraged and able to raise concerns about the treatment of colleagues or practices within our business or supply chain, without fear of reprisal. Our whistleblowing process provides a confidential route for reporting concerns.
3. **Code of Business Conduct:** This code sets out how we behave as an organisation and the standards we expect of our employees, contractors and suppliers in all business dealings.

Our Suppliers, Due Diligence Processes, Risk Assessment and Management

Focus Group conducts due diligence on all new suppliers before they are approved as preferred suppliers. Our due diligence process includes:

- Screening suppliers against relevant sanctions and conviction databases to identify any history of offences relating to modern slavery or related crimes
- Requiring all suppliers to confirm that no part of their business operations contradicts our Anti-Slavery and Human Trafficking Policy

- Requesting copies of suppliers' own modern slavery statements where they are required to produce one under the Act
- Reviewing the nature, geography and tier complexity of each supplier's supply chain to assess relative risk

As part of our standard contract terms with suppliers, we require them to confirm that:

1. They have taken steps to eradicate modern slavery within their own business and supply chain
2. They hold their own suppliers to account with respect to modern slavery risks
3. They will notify us immediately if any instance of modern slavery comes to their attention
4. Focus Group may terminate the contract immediately should any instance of modern slavery come to light

We keep our approach to due diligence under review and will continue to develop our processes in line with good practice guidance and any changes to the legislative framework.

Training

Focus Group also conducts a range of training initiatives including, but not limited to, an induction for new employees, in addition to sharing our policies for review and employee agreement that covers our general rules, and the importance of acting with integrity in line with our core Company values.

Our Performance Indicators

We use the following indicators to monitor the effectiveness of our practices and procedures:

- Number of suppliers screened as part of our due diligence process
- Number of suppliers who have provided a valid modern slavery statement
- Number of concerns or reports raised internally relating to modern slavery (including via whistleblowing channels)
- Number of supplier contracts reviewed or terminated due to modern slavery concerns

For FY2025/26, Focus Group has not received any concerns, feedback or reports from employees, customers, members of the public or law enforcement agencies indicating that modern slavery or human trafficking is taking place within our business or supply chains. We recognise, however, that the absence of reports does not in itself confirm

the absence of risk, and we remain committed to proactively reviewing and strengthening our controls.

We will continue to review our performance indicators annually to ensure they reflect best practice and provide a meaningful measure of our efforts to combat modern slavery.

Approval and Sign-off

This statement has been approved by the Board of Directors of Focus Group.

Signed:



Date: 29th April 2026

Neil Hall, Chief Executive Officer, Focus Group

This statement includes all subsidiary companies listed below: Focus 4 U Ltd, & Partners, Boxx Communications Ltd, EVAD Holdings Ltd, Focus Select Ltd, GB Technologies Ltd, HighNet Telecom Ltd, Incom Business Systems Ltd, Incom-CNS Wales Ltd, Infosec Cloud Ltd, On Line Systems (Northern) Limited, Resource Telecom Ltd, South West Communications Group Ltd, STL Communications Ltd, Cellular Solutions & Services Ltd, Cloud Voice & Data Ltd, Entropie Ltd, Midland Telecommunications Management Ltd, Pinnacle Communications Ltd, RPM Business Communications Ltd, Silver Lining Convergence Ltd, Atmoso Ltd, Contract Systems Ltd, Prism Business Developments Ltd, Matrix 247, Datasharp Ltd.

This schedule will be updated as new entities are acquired or incorporated.