



Modern Slavery and Human Trafficking Statement 2025/26

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Introduction

It is my pleasure to introduce our Modern Slavery Statement for the Financial Year 2025/26.

This statement sets out the progress we have made over the past 12 months to strengthen our controls, improve oversight and further mitigate the risk of modern slavery and human trafficking across our business and supply chain, as well as outlining our priorities for the year ahead.

During the year, we have significantly matured our approach by centralising accountability for modern slavery compliance within a single, dedicated function. This has enhanced governance, ensuring greater consistency, clarity of ownership and more robust application of our policies and controls across the organisation.

We have also strengthened our central risk assessment framework, enabling a more targeted and data-led approach to identifying and managing higher-risk areas within our operations and supply chain. This has been supported by a more structured and rigorous audit programme, with clearer escalation and intervention where risks are identified.

In parallel, we have enhanced our reporting capabilities, improving the quality, transparency and frequency of insight available at both operational and Board level. This ensures we are better positioned to monitor performance, track progress against our strategy and hold ourselves to account for continuous improvement.

Our Modern Slavery Working Group has continued to play an important role in driving focus and momentum in this area, and I remain confident that the progress we have made this year further strengthens our position as a responsible and values-led organisation.

We also continue to engage with external expertise and industry best practice to ensure our approach remains aligned to evolving expectations, whilst retaining a clear focus on delivering practical, measurable outcomes.

Modern slavery remains a critical issue, and we are committed to maintaining a disciplined, transparent and continuously improving approach to managing this risk.



A stylized, handwritten signature in black ink, appearing to read 'J. Knights'.

Jason Knights,
Chief Executive Officer



Legislative statement

This statement sets out the actions Ground Control has taken to understand all potential modern slavery risks related to our business. The statement then outlines the actions we have taken to mitigate the risk of modern slavery and human trafficking within Ground Control Holdings Ltd and all of its entities, including Ground Control Ltd.. This is our ninth statement under the Modern Slavery Act 2015 and constitutes our Modern Slavery Statement for the financial year ending 31st March 2026. It details the key activities we have undertaken to demonstrate our commitment to making a positive difference in reducing the modern slavery risks that could be connected to our business.

We know modern slavery and human trafficking is a growing issue in our society and we remain committed to doing all we can to eradicate it. For this reason, we will continue to review our approach and actions to ensure we are doing all we can to minimise the risk of modern slavery occurring within our business or supply chain.

Within Ground Control, we use the Ethical Trading Initiative's (ETI) Base Code as our guide for ethical employment practice. Our work towards exceeding goals in this area is intended to support our efforts in addressing any modern slavery risks within our industry. We also remain compliant with, and expect our suppliers to remain compliant with, the principles set out in the UN Global Compact Initiative, the International Labour Organisation's standards on child labour and minimum age, and the principles of the Modern Slavery Act 2015.

Who we are

Ground Control, established in 1973, is a "can-do" entrepreneurial business founded on the core principles of quality and delivering an outstanding service. With revenues of circa £195m across the group, we provide comprehensive, multi-disciplined and integrated services to support our customers with all their external property needs across our four operational divisions.



Maintenance

Infrastructure

Land and Water

Landscape,
Design and
Energy

Finance

People and HSQE

IT

Our supply chain is predominantly national (with a growing operation in the Republic of Ireland), and our procurement activity is largely centralised, with the department sourcing materials and equipment principally related to the provision of services to our customers.

We also have a network of Field Teams who work on our behalf delivering work across the UK and the Republic of Ireland.

Our values

Ground Control is a values-driven business. Our values are reflected in our actions, policies and processes, and we expect all our people and partners to be deeply familiar with what our values mean to us. They are the foundation upon which we approach a complex issue and we do so with integrity, commitment and a genuine desire to effect positive change.

By integrating our values within our business we give our people and partners guiding principles and help them to prioritise behaviours that align with integrity, fairness and respect for human rights. They also provide a framework for us as we grow, ensuring our people have a sense of purpose as they seek to navigate changing markets and sectors.



We deliver **outstanding** customer service



We **value** each other



We act with **integrity** and **honour** our commitments



We seek **value** in everything we do



We **innovate** and **embrace change**



We **win** as a team



If it is to **be** it is up to **me**

Our commitment on modern slavery

At Ground Control, we are steadfastly committed to leading the fight against modern slavery. With responsibility as one of our guiding principles, we pledge to set the standard for ethical practices in our industry. We've been recognised externally for our work on combatting modern slavery and we aim to be recognised as a beacon of excellence within our industry, driving transparency, accountability and innovation throughout our operations and supply chains. We will continue to invest in robust due diligence, engage with stakeholders and champion collaboration to eradicate modern slavery.

Our vision is one where modern slavery has been eradicated within our industry and we are aiming to be recognised as a beacon of excellence within the modern slavery space, driving transparency, accountability and innovation throughout our operations and supply chains.



2025/26 progress

2025 was a year of consolidation for us as we continued to make progress with our work on combatting modern slavery. This section outlines our key actions and progress in the past year.

Leadership

All employees are required to complete annual e-learning on modern slavery, with enhanced, role-specific training delivered to colleagues in higher-risk and control functions, including People, Procurement and Supply Chain. Our approach places strong emphasis on ensuring that training is not a one-off activity, but a sustained and embedded part of how we build capability across the organisation. Through regular reinforcement, targeted content and clear accountability, we continue to drive both awareness and practical application in day-to-day roles.

During the year, we maintained strong engagement with our mandatory modern slavery training programme, although we did not achieve our stretch target of 97% completion. This was primarily due to the practical challenges of reaching some of our frontline and manual employees, many of whom do not have regular access to computers as part of their day-to-day roles. To address this, we increased our focus on operational audits, face-to-face engagement, site visits and toolbox talks to ensure awareness remained high and key messages continued to be reinforced across the workforce. Alongside this, our leadership, Procurement, Supply Chain and People teams maintained full participation in enhanced modern slavery training. Having achieved over 95% completion in previous years, we will re-

benchmark our target for the coming year and continue to drive strong levels of engagement through a blended approach to learning, with the aim of returning to at least 95% completion while ensuring meaningful awareness across all employee groups.

As part of strengthening our overall control environment, our Talent function has been fully integrated into the People Business Partnering structure. This has improved alignment between recruitment activity and operational oversight, enabling enhanced divisional reporting and providing clearer visibility of all new starters across the business. As a result, we have strengthened governance within our hiring processes, ensuring that risks are more effectively identified, managed and monitored at a local and central level.

In conjunction with our Modern Slavery Working Group, we continue to actively engage our leaders through regular operational briefings and targeted communications. This ensures that modern slavery risks are clearly understood, consistently prioritised and actively managed across all areas of the organisation, reinforcing accountability at every level.

Governance

Now fully embedded within the business, our Modern Slavery Working Group, established in 2023 and chaired by our Chief People Officer, Lisa Blakey, is a core part of our governance framework. The group plays a central role in overseeing and shaping our approach to managing modern slavery risk, and is firmly established as the driving force behind both our strategic direction and operational delivery in this area. It continues to provide regular insight and assurance to both the Executive Committee (ExCo) and the Board.

Building on the strong foundations established in previous years, the focus of the group has increasingly evolved towards strengthening our risk management approach. This includes enhancing our centralised risk assessment framework, ensuring risks are more clearly identified, assessed and prioritised across both our operations and supply chain. The group has also overseen the further development of our audit programme, enabling more targeted and robust assurance activity, alongside clearer escalation and intervention where risks are identified.

The group continues to lead the ongoing implementation and review of our Modern Slavery Strategy, ensuring it remains aligned to our evolving risk profile, audit outcomes and business priorities. It also maintains oversight of our Modern Slavery Policy, ensuring it continues to reflect both regulatory expectations and best practice, while driving consistent application across the organisation.

Through this more structured and mature approach, the Working Group ensures that modern slavery risk remains actively managed, with clear accountability, stronger controls and continuous improvement embedded across all areas of the business.



"Our Modern Slavery Working Group provides a clear and practical forum for driving focus, consistency and accountability in how we manage risk across our operations and supply chain. It brings the right level of challenge and support, helping to ensure that our approach is both robust and embedded in day-to-day decision making.

From an operational standpoint, the structure and visibility this creates are critical. It enables us to better understand where risks may arise, respond quickly where needed, and ensure that standards are applied consistently across the business.

I am fully committed to this agenda and to ensuring that modern slavery remains a core consideration in how we operate. The continued focus from the Working Group, combined with the strengthening of our processes and controls, gives me confidence that we are taking the right steps to manage this risk effectively and responsibly."

**Darren Daley, Maintenance and Ireland,
Managing Director**



Our Strategy

In 2024 we launched our Modern Slavery Strategy which sets out our approach to Modern Slavery based around four key principles:



1. Prevention
Preventing the risks of modern slavery occurring within our workforce or supply chain.



2. Identification
Identifying any possible instances of modern slavery, or risks within our workforce and supply chain.



3. Mitigation
Taking robust action where modern slavery risks have been identified and looking to reducing any likely impact on individuals or victims.



4. Remediation
Ensuring victims or survivors are supported to lead lives free of future risk.

The strategy sets out a focus on a number of core objectives. We review the strategy annually, ensuring that all of the actions under our core objectives are delivered helping us to expand our approach to modern slavery and supporting our work towards achieving our vision of eradicating modern slavery within our industry. We aim to be recognised as a beacon of excellence within the modern slavery space, driving transparency, accountability and innovation throughout our operations and supply chains.

Our progress against our strategy is overseen by our Modern Slavery Working Group with reports being reviewed bi-annually to ensure we remain on track to deliver.



Our focus is on five core objectives:



Education and awareness
Educating our people and building awareness to ensure they can recognise the signs and risks of modern slavery.



Responsible recruitment and procurement
Ensuring we engage and work with people and suppliers who align with our values and commitment to tackling modern slavery.



Effective speak-up mechanisms
Ensuring we are creating an environment where people are empowered to raise concerns and supported to do so.



Risk assessments and audits
Increasing our capability in this area to reduce the risk of modern slavery occurring within our business.



Remediation and victim support
Ensuring we work with partners to provide support for potential victims.

"Developing our Modern Slavery Strategy was a significant step in bringing greater clarity and structure to how we address this critical issue across Ground Control.

Our focus has been on ensuring that our approach is not only values-led, but also practical and embedded, giving our teams the guidance, tools and accountability needed to identify and manage risks effectively in their day-to-day roles.

By taking a more structured and proactive approach, we are strengthening our ability to protect people across our business and supply chain, while continuing to raise awareness and drive meaningful, long-term change within our industry."

Lisa Blakey, Chief People Officer



Policies and Systems

At Ground Control, all policies are subject to annual review to ensure they remain aligned with both regulatory requirements and the evolving risks within our business and supply chain. During the year, we undertook a comprehensive review of our policies in line with the requirements of the Employment Rights Act, ensuring that our approach continues to meet legislative expectations while strengthening protections for our workforce.

As part of this review, we further reinforced our policy framework to ensure clear and consistent expectations for our people, Field Teams, suppliers and partners. This included enhancing references to modern slavery and human trafficking across key policies, ensuring that our commitments are clearly articulated and embedded across all areas of the business.

In line with our obligations under the Ethical Trading Initiative (ETI) Base Code, we also introduced a standalone Child Labour Policy. This provides greater clarity on our expectations and controls in this area, strengthening our ability to identify, prevent and respond to child labour risks within our operations and supply chain.

We have also updated our Supplier Code of Conduct as part of our broader work in support of the Armed Forces Covenant, ensuring it reflects both our ethical standards and our expectations of those we work with. The updated code reinforces our zero-tolerance approach to modern slavery and sets clear requirements for suppliers, which are monitored through our ongoing due diligence, audit and supplier review processes.

Through this structured and proactive approach to policy governance, we ensure that our framework remains current, comprehensive and effective in supporting the identification and management of modern slavery risks.



We continue to utilise Safecall as our independent whistleblowing provider, providing a confidential and externally managed channel for raising concerns. This ensures all issues are subject to impartial review and supports our compliance with whistleblowing and data protection requirements.

Safecall is embedded as a key component of our control framework, providing a clear and accessible route for employees, Field Teams and wider stakeholders to report concerns, including those relating to modern slavery. The helpline is prominently communicated across the business, including on all company ID cards and through ongoing organisational communications, alongside signposting to the national Modern Slavery & Exploitation Helpline.

Through this approach, we ensure that individuals have the confidence and ability to report concerns safely, while enabling the business to identify, investigate and respond to potential risks in a timely and structured manner. Safecall therefore plays a critical role in strengthening transparency, supporting early intervention, and underpinning our broader efforts to proactively manage modern slavery risks across our operations and supply chain.

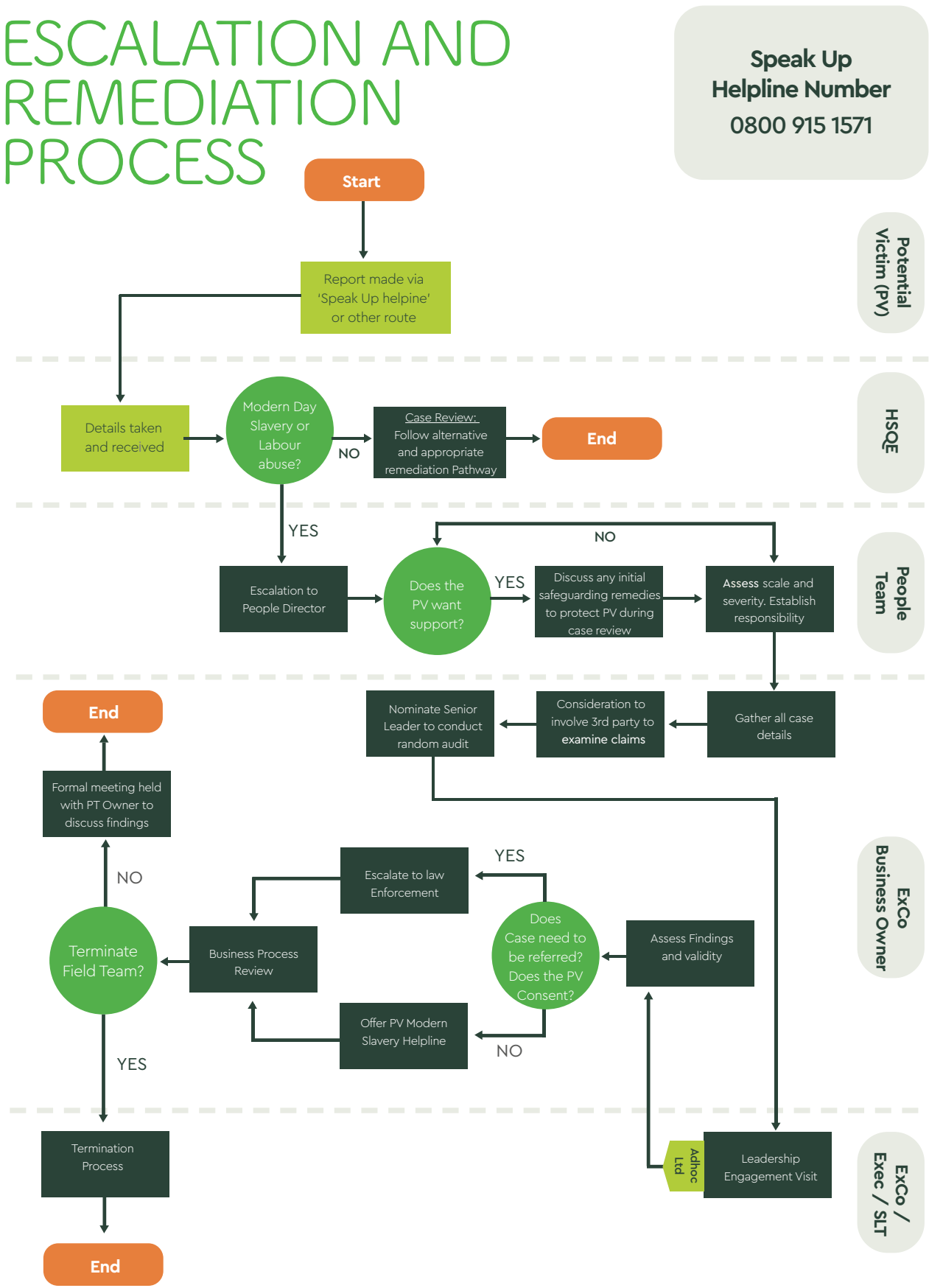


Escalation and remediation process

In 2023, we introduced our escalation and remediation process, which continues to provide a clear and structured framework for identifying, managing and addressing any modern slavery risks. The process establishes defined pathways for raising concerns, enabling individuals to come forward confidently and ensuring that all matters are handled in a consistent, timely and transparent manner.

Our approach places victim support at the centre of any action we take, ensuring that where risks are identified, appropriate steps are taken to protect individuals and provide effective remediation. Alongside this, the process is designed to ensure that root causes are understood and addressed, reducing the likelihood of recurrence and strengthening our overall control environment.

This framework has now been further reinforced and is mirrored within our Child Labour Policy, ensuring a consistent approach to escalation, intervention and remediation across all aspects of labour exploitation risk. Together, these mechanisms enable us to respond effectively to concerns, while continuing to enhance our ability to proactively prevent and manage risks across our operations and supply chain.





Risk Assessments

Our approach to assessing and managing modern slavery risk continues to mature, with our central corporate modern slavery risk register remaining the foundation of our risk identification, assessment and control activity. Over the last year, this has been strengthened through the development of business unit risk registers that reflect the specific risks within each operational area and align with changes to Ground Control's business structure. This provides greater local ownership, improves visibility of emerging issues and supports the implementation of controls that are better matched to the nature of each business unit's work and client requirements.

All modern slavery risks are assessed against scale, scope and remediability, with both inherent and current risk levels recorded within the register. Reviews continue to take place every six months in collaboration with our HSQE and People teams, ensuring that risk ratings and controls remain current and effective. We have maintained alignment with the ETI Base Code indicators to support best practice and provide a consistent framework for assessing our exposure and the effectiveness of our response.

We continue to recognise the increased risk associated with unusual working patterns, particularly for those working alone or outside of typical operating hours. This remains one of our more significant risk areas, and during the last year we have strengthened our controls through the use of the lone worker system within SafetyCulture to monitor working hours & locations more effectively. Where patterns indicate a potential fatigue exceedance, HSQE engages directly with those

affected to provide advice, review the circumstances and determine whether further action or controls are required. Our modern slavery risk registers are also now integrated into the HSQE Performance Hub, a central Power BI dashboard that brings together wider HSQE data and helps highlight where risks may require additional controls, review or escalation.

Industry Risk

Ground Control operates across a wide range of industries, and our partnership with Unseen continues to provide current insight into wider modern slavery trends and sector-specific risks. These insights are incorporated into our modern slavery risk registers to ensure that areas of heightened exposure receive the appropriate level of scrutiny, control and review. At present, our LDE business unit remains our highest-risk area due to the nature of its supply chains, although the level of oversight and control within that business unit continues to increase. We continue to promote modern slavery controls extensively within LDE and provide regular compliance reporting to divisional leaders to support accountability and improvement. Our newly established Land and Water business unit is also an area of focus, as modern slavery controls are being embedded alongside the development of its ways of working, helping to ensure that the right expectations and safeguards are established from the outset.

Supplier Risk

Over the past year, we have continued to strengthen our supplier due diligence processes to ensure modern slavery risks are identified and managed consistently across our supply chain. All suppliers undergo a modern slavery review at onboarding, regardless of size, and are then subject to annual review, with additional oversight applied to higher-risk suppliers where required. This approach is supported by our supplier risk register, which helps us track supplier risk, monitor the effectiveness of controls and prioritise further review where appropriate. Our tiered supplier model supports this risk-based approach, with Tier 1 and Tier 2 suppliers required to provide evidence of their modern slavery commitment and controls, including modern slavery policies and right to work checks. We are also reviewing our supplier onboarding procedures to improve efficiency and bring them into closer alignment with our subcontractor management processes, helping to strengthen governance while making expectations clearer and more consistent across the business.

Labour Risk Assessment

We recognise that labour-related vulnerability can arise in different ways across our business and that effective modern slavery prevention depends on understanding those risks in context. As part of our annual labour risk assessment, we continue to review where individuals or groups may be more vulnerable to

exploitation and to ensure that proportionate controls are in place. This includes consideration of role type, working environment, communication needs, working patterns and wider personal circumstances, allowing us to take a more informed and preventative approach to worker protection.

While labour risk is considered across the whole organisation, we recognise that some manual and operational roles can carry a higher level of exposure due to the nature of the work, patterns of supervision and the environments in which individuals may be working. We also recognise that factors such as neurodiversity, special educational needs and disabilities, or English as a second language can increase vulnerability where communication, support or oversight are not appropriately tailored. In response, we continue to promote clear communication, accessible information, regular engagement and appropriate management support to help ensure all employees understand their rights, feel able to raise concerns and are treated fairly and consistently. Our approach is further strengthened through the use of the lone worker system within SafetyCulture, which provides improved visibility of lone working activity, supports welfare check-ins and enables us to monitor working hours more effectively. Where patterns indicate a potential fatigue exceedance or other welfare concern, HSQE engages directly with the individual and relevant managers to review the circumstances and determine whether further support or control measures are required.

Our auditing and inspection regime continues to develop, supporting our catalogue of accreditations while helping to build understanding, consistency and accountability across the business. During the year, we further refined our audit methodology to promote a more constructive and educational approach, ensuring that auditees are supported not only in understanding what is required, but why those requirements matter. By referencing and interpreting relevant clauses, standards and best practice during the audit process, we help operational and business leaders strengthen compliance in a way that is more informed, practical and sustainable. This approach has also shaped the continued development of our site inspection templates, which are designed to provide useful guidance while making it easier for managers to identify issues and raise concerns. Our leadership engagement template is now fully in use and integrated into the HSQE Performance Hub, supporting greater visibility of engagement activity and reinforcing our focus on welfare, conditions and meaningful face-to-face interaction between operatives and leaders.



Site Visits

The Ethical Employment Checks introduced last year continue to form a central part of our modern slavery inspection regime. Their use is now established across a growing number of areas within Ground Control and continues to expand, supported through close collaboration between the People team, HSQE and the Modern Slavery Working Group. During the year, we strengthened the governance around these checks through regular review meetings and weekly reporting shared with management, improving visibility of findings, supporting follow-up action and helping to drive wider adoption across the business.

The scope of Ground Control's health surveillance procedures has now been expanded across the workforce, strengthening our ability to identify welfare or occupational health concerns early and promote timely action to reduce risk. As this expansion has progressed, we have continued to work through the resulting backlog to ensure that reviews, follow-up actions and recommended controls are addressed appropriately and consistently.

Site visits are carried out frequently across the business by contract managers, operational leaders and other business leaders, on both a scheduled and unscheduled basis. These visits provide an important opportunity to review working conditions, team performance and compliance with our policies and procedures. During site visits, team members are engaged directly and ID badges are verified to confirm that only those expected to be on site are present. In addition, our SSV template, which forms part of our core site inspection process, now includes specific prompts relating to welfare and modern slavery indicators, alongside the Ethical Employment Checks. This helps ensure that site visits not only assess operational performance, but also provide a practical mechanism for identifying concerns, promoting worker welfare and reinforcing our wider modern slavery controls.



Data audits

We continue to carry out monthly reviews of people and team data to support the identification of potential modern slavery risks and maintain consistency in our monitoring activity. These reviews include checks on duplicate details, right to work status and bank details, helping us to identify anomalies or patterns that may require further scrutiny. The overall risk picture arising from this work continues to inform our Modern Slavery Risk Register, ensuring that relevant themes and concerns are considered within our wider risk assessment and control framework.

SMETA & ETI Base Code

We continue to use both SMETA and the ETI Base Code as important elements of our external assurance approach, helping to provide clear visibility of our modern slavery commitments across the industries and supply chains in which we operate. Our compliance portal continues to be maintained at 100% population, reflecting our expectation that the information supporting our controls, commitments and assurance activity remains complete, current and transparent. We are also subject to fully blind, unannounced SMETA audits, which provide an independent test of our day-to-day compliance with the ETI Base Code rather than a prepared response to a scheduled review. This approach supports our commitment to genuine, continuous compliance and reflects Ground Control's proactive stance in strengthening modern slavery governance across the business.

Modern slavery process audits

Ground Control's integrated management system continues to support a structured and risk-based approach to modern slavery prevention. As part of this, we carry out an annual review of our modern slavery processes to assess the effectiveness of the controls embedded across our management system, identify opportunities for improvement and ensure that our approach remains aligned to the needs of the business and the wellbeing of our people.

Payroll assurance remains an important part of this control framework, particularly following the implementation of our new payroll system in 2025. The new system provides greater automation and improved visibility of monthly payroll data, supporting a more consistent and effective review process. Through these reviews, we continue to confirm that employees are paid at or above Real Living Wage levels and that overtime payments remain consistent with reasonable working hours. Where patterns of extended hours are identified, we engage directly with the individuals concerned to understand the circumstances and determine whether any further support or intervention is required, helping to promote wellbeing and reduce the risk of fatigue-related harm.

Auditing Systems

Any nonconformities or opportunities for improvement identified through audit activity are managed through the Ground Control Auditing tool. Recent upgrades to the system have improved the way findings are recorded and tracked against relevant standards and compliance requirements, including BS 25700 – Organisational responses to modern slavery. All findings are assigned, tracked and closed through the system under the oversight of the Quality team, helping to ensure that actions remain visible, accountable and properly followed through. This information can also be viewed through the HSQE Performance Hub, providing wider visibility of audit outcomes and supporting more effective oversight across the business.

Reporting

Modern slavery audit and risk reporting continues to be strengthened through the HSQE Performance Hub, which is available to management across Ground Control and provides a central view of key assurance and risk information. This supports greater visibility of modern slavery controls across the business and enables leaders to review current status, emerging themes and areas requiring further attention. The information within the Hub is also communicated directly to the Executive team through weekly reporting, helping to maintain oversight at senior level and support timely decision-making where action may be required.

The Hub includes visibility of completed audits, nonconformities, modern slavery checks, health surveillance activity and current risk status, providing a more integrated view of control effectiveness and assurance performance. It also includes AI-powered summaries to support the early identification of trends and encourage proactive action where emerging issues or patterns are identified. We have also increased the base reporting frequency for completed modern slavery checks from monthly to weekly, improving the timeliness of management information and supporting a more responsive approach to oversight and follow-up.

"Ground Control's commitment to recognising and eliminating modern slavery risk within our industries is something I am proud to stand behind. We are focused on continually improving the systems, controls and behaviours to identify & mitigate potential risk. Our audit function is central to that effort, helping to ensure we remain vigilant, accountable and committed to doing the right thing."

Phillip Marshall, Head of Quality



Our aims for 2025/26

Building on the strong foundations established in previous years, we have continued to strengthen our approach to managing modern slavery risk, with an increased emphasis on the role of procurement in driving effective supplier oversight. Our focus has remained on consistency, discipline and continuous improvement, recognising that sustainable progress depends on embedding robust practices across both our operations and our supply chain.

Over the past year, we have delivered against the core objectives set out in our Modern Slavery Strategy, with particular progress in enhancing how supplier risk is identified, assessed and managed through our procurement processes. While we have made meaningful progress, we remain clear that maintaining momentum and continuing to strengthen supplier governance will be critical as our business and supply chain continue to grow and evolve.

Looking ahead, our priority is to further embed and refine the approach we have already established, ensuring that procurement-led supplier due diligence and oversight are applied consistently, supported by enhanced visibility, clearer accountability and strengthened governance.

Our key areas of focus for the year ahead are:

- 1. Embed our Modern Slavery Strategy in full, ensuring consistent application across all divisions, with clear accountability and measurable outcomes aligned to our strategic objectives.
- 2. Continue to enhance awareness and capability, maintaining strong focus on training across the organisation, particularly within Field Teams and those involved in procurement and supplier management, to ensure risks are understood and actively managed in day-to-day operations.
- 3. Further strengthen our risk assessment approach, with an increased focus on supply chain risk profiling, leveraging procurement data and insight to improve how we identify, prioritise and manage higher-risk suppliers alongside our ongoing labour risk assessments for Field Teams and their operatives.
- 4. Enhance supplier due diligence and ongoing monitoring, underpinned by stronger procurement leadership, embedding more structured onboarding, segmentation and review processes to ensure a consistent and risk-based approach across our supply base.
- 5. Strengthen supplier engagement and expectations, ensuring that our standards are clearly communicated and reinforced through contractual frameworks, onboarding processes and ongoing supplier relationships, with procurement playing a central role in driving compliance.
- 6. Maintain a proactive and structured approach to audit and assurance, ensuring that insights from our risk assessments, supplier reviews and procurement activities are used to drive continuous improvement and inform decision-making at both operational and Board level.

Through this continued focus, we are strengthening the effectiveness of our existing framework, ensuring it remains robust, procurement-led where appropriate, consistently applied and responsive to the evolving risks within our business and supply chain.

KPIs

KPI	Target	Reasoning
Ground Control culture – employees feel Ground Control is driven by outcomes and values as well as profit.	80%	Question in the Ground Control Engagement Survey: "Ground Control is driven by outcomes and values as well as profit."
Training – employees and Field Teams are aware of the risks of modern slavery.	95% of all employees complete training in modern slavery and human trafficking. 85% of Field Team operatives completed training in modern slavery and human trafficking. 100% of leadership team have been through enhanced modern slavery and human trafficking training.	Demonstrates awareness of the causes, risks and issues related to modern slavery and human trafficking.
Modern slavery risks are proactively assessed via our supplier onboarding channels.	Continue to position Modern Slavery as an agenda item for all Tier 1 suppliers in Supplier Relationship meetings and in Joint Supply Plans, including auditing Tier 1 suppliers to ensure they are managing and mitigating all risks. 100% of all new suppliers are to either have their own Code of Conduct or to agree to our Supplier Code of Conduct which details our commitment to tackling modern slavery. 100% of all new suppliers who are classified as high risk of modern slavery on the Supplier Risk Register to receive the enhanced modern slavery questionnaire and assessment with the team prior to onboarding.	Demonstrates awareness of the causes, risks and issues related to modern slavery and human trafficking.
Field Teams are actively engaged with combatting modern slavery.	50% of Field Teams who implement their own modern slavery, whistleblowing and equality policies.	Demonstrates awareness and commitment from our Field Teams.
Adherence to modern slavery best practice provisions across the Ground Control group.	At least 12 audits to be completed annually if a member of an operational leadership team. At least four audits to be completed annually if a member of a non-operational leadership team.	Enables organisation to identify risks and look to address concerns raised while demonstrating leadership commitment to eradicating modern slavery.

How we performed against our aims and KPIs in 2024/25

We maintained strong engagement with our mandatory modern slavery training programme, although we did not achieve our stretch target of 97% completion. This was largely due to the challenges of reaching some frontline and manual employees who do not routinely access computers as part of their roles. To address this, we increased our focus on operational audits, site visits and face-to-face engagement to ensure awareness remained high across the workforce. Having achieved over 95% completion in previous years, we will re-benchmark our target for the year ahead and continue to drive engagement through a blended approach to learning, with the aim of returning to at least 95% completion.

Procurement remains a critical focus area, with much of the supplier oversight work still conducted manually. We are investing in further training for our procurement team and have an action plan in place to address some of the findings from our audit completed last year. The action plan focuses on further enhancing our risk assessments in this area. We also intend to explore opportunities for greater digitalisation and automation

of key procurement tasks, ensuring modern slavery remains a core agenda item in supplier meetings. The rollout of our new Supplier Code of Conduct in 2024 has helped set clearer expectations across our supply base. While we met our procurement KPIs, we recognise that continued support and development of our internal capabilities is essential.

All Field Teams were issued updated policies on Modern Slavery, Whistleblowing, and Equality and Diversity and asked to implement these templates within their business. Ensuring that we build out focus on these policies will be a key priority for the coming year, and we will enhance monitoring and engagement to improve compliance and understanding.

Our audit programme remains robust, with regular on-site audits conducted throughout the year. In 2024, we introduced improved audit templates to strengthen reporting and consistency and we have continued to utilise this in our engagements with suppliers. These audits continue to be an essential part of our approach, and we are committed to maintaining this level of oversight going forward.



Working at Ground Control

Our people

At Ground Control, we are deeply committed to supporting our people and minimising the risks of modern slavery within our operations and supply chain. We are proud to be an accredited B Corp employer and to hold Investors in People and Best Companies status, all of which recognise our sustained investment in our people and our commitment to creating an inclusive, ethical and sustainable employment environment.

As a Real Living Wage accredited employer, we ensure all of our employees receive fair and equitable compensation for their contributions. We prioritise the financial stability and wellbeing of our workforce, supported by clear and equitable reward practices. Our employee hardship fund remains in place and continues to provide targeted financial support, helping colleagues manage unexpected financial pressures and, in some cases, reduce personal debt.

Our annual engagement survey continues to provide valuable insight into the experiences of our workforce, enabling us to identify key drivers of engagement and areas for improvement. Following the introduction of a new external survey provider, we have further refined our approach to ensure we are capturing the right data to inform action. Encouragingly, employee feedback continues to highlight that Ground Control is considered a supportive, values-led and ethical organisation, with strong relationships between colleagues and managers.

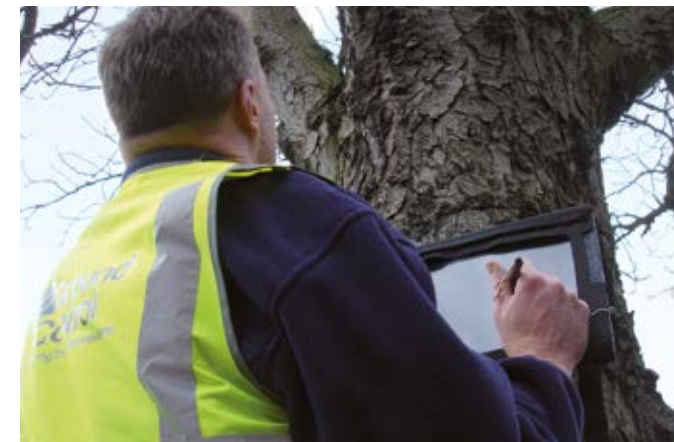
Over the past year, we have further strengthened our approach to communication, bringing together our marketing and communications functions under unified leadership. This has enabled a more coordinated and consistent approach to colleague engagement, leadership communication and organisational messaging, including our focus on ethical practices and modern slavery.

We continue to maintain a comprehensive suite of policies designed to support our people and uphold their rights. During the year, all policies have been reviewed and updated to ensure full alignment with the Employment Rights Act and evolving best practice. We have also introduced a dedicated Child Labour Policy, reinforcing our commitment to protecting vulnerable groups and ensuring clear standards are upheld across both our operations and supply chain. Our Human Rights, Grievance, Whistleblowing and Modern Slavery policies remain central to our framework, providing transparent and accessible routes for raising concerns.

Our recruitment processes remain robust and continue to evolve. Oversight now sits with our People Business Partners across each division, ensuring closer alignment to operational activity, stronger accountability and consistent application of our ethical recruitment standards. This includes rigorous right-to-work checks, ongoing data audits and structured candidate engagement. All processes are mapped, reviewed annually and subject to regular audit to ensure compliance and identify any emerging areas of risk.

We have also further strengthened our procurement leadership, recognising its critical role in managing modern slavery risk across our supply chain. This provides a clearer, more coordinated approach to supplier engagement, due diligence and ongoing oversight.

Our Learning and Development function continues to be a significant strength within the organisation, supported by a highly capable and committed team. Over the past year, we have continued to invest in structured management and leadership development programmes, alongside targeted training in areas such as conflict management and handling difficult conversations. This ongoing investment supports our culture of openness, challenge and continuous improvement, ensuring our people are confident in raising concerns and addressing risks effectively.



Examples of monthly audits

Over the past year, we have continued to strengthen our approach to monitoring and managing people data, maintaining monthly audits to identify and investigate potential duplicate records, including bank details, next of kin and address information. While some duplication can occur due to family members working within the business, all instances are validated to ensure accuracy and mitigate risk.

Payroll oversight has remained a key focus, supported by the implementation of a new system in 2025, enabling improved automation and enhanced visibility. Monthly reviews ensure all employees are paid at or above the Real Living Wage and that working hours remain appropriate. Where patterns of extended hours are identified, we engage directly with individuals to understand the underlying factors and provide support, helping to promote wellbeing and reduce fatigue-related risks.

Treating our people with dignity, respect and fairness remains central to our culture. We continue to strengthen our approach to identifying and managing modern slavery risk through regular labour risk assessments and welfare audits, alongside robust processes to support lone workers and safeguard vulnerable groups. Ongoing health surveillance also enables us to respond proactively to wellbeing needs across our workforce.

While we recognise that risk cannot be entirely eliminated, our focus remains on maintaining strong oversight, early intervention and continuous improvement to ensure our people are protected and supported in every aspect of their working day.

Modern Slavery in Ireland

In 2024, Ground Control expanded its operations into the Republic of Ireland. While this represents an important stage in our growth, we recognise that entering new territories introduces additional risk considerations, including those related to modern slavery. These risks continue to be proactively incorporated into our existing risk management framework.

Our Modern Slavery Working Group has extended the scope of our established processes and controls to ensure they remain fully applicable to our Irish operations. This includes alignment of risk assessments, supplier due diligence and governance processes, ensuring a consistent and disciplined approach across all regions.

While there remains no direct equivalent to the UK Modern Slavery Act requiring corporate reporting in Ireland, the legislative landscape continues to evolve

with influence from the EU. Reflecting this evolving landscape, we have made a deliberate decision to continue applying the same high standards expected under UK legislation across our Irish operations. This ensures a consistent, values-led and robust approach, while positioning us to respond proactively to emerging regulatory requirements at both Irish and EU level.

To support this, we continue to engage with key industry bodies and stakeholders, including maintaining our membership of the Ireland Modern Slavery Council. This enables us to collaborate with peers, share best practice and remain informed of legislative developments, ensuring a strong and visible focus on modern slavery risk within our Irish operations and contributing to wider industry progress.



Our Field Teams

Ground Control operates through a network of over 1,000 Field Teams across the UK and Ireland. These teams comprise sole traders, partnerships and small limited companies who are specialists in delivering services to our clients. Many of our Field Teams have worked with us for a number of years, helping us maintain continuity, quality and strong working relationships across our operations.

Unlike many organisations operating within our sector, we do not typically rely on agency labour or transient labour sources to deliver services. Our Field Team model remains central to our approach to reducing modern slavery risk within our labour supply chain. By maintaining direct relationships with those delivering work on our behalf, we are able to understand who is carrying out work, verify their right to work and qualifications, and ensure that appropriate employment and compliance arrangements are in place.

All Field Teams undergo a robust onboarding and induction process managed by our Supply Chain team. Each team is assigned a dedicated operational sponsor who is responsible for supporting the team and ensuring compliance with Ground Control's requirements. We continue to verify right to work documentation for all operatives in accordance with Section 8 of the Asylum and Immigration Act 1996 and maintain stringent controls to ensure compliance remains current.

Our Skillko compliance management platform is now fully embedded across our Field Team network, providing real-time visibility of qualifications, training records, certifications and compliance status. The platform enables Field Team owners to manage compliance proactively and ensures that Ground Control retains full oversight of compliance requirements across its operations. All teams and operatives are assessed against our compliance standards and are not permitted to undertake work unless all mandatory requirements have been met.

Modern slavery awareness remains a mandatory annual training requirement for all operatives working on our behalf. We continue to supplement online training with face-to-face engagement during significant contract mobilisations and operational events. These interactions provide valuable opportunities to reinforce awareness, discuss potential indicators of exploitation and ensure operatives understand how to raise concerns.

Field Team owners are required to enter into Ground Control's Framework Agreement as a condition of engagement. This agreement requires compliance with the Modern Slavery Act 2015, the Gangmasters Licensing Act 2004 and other relevant employment and ethical working standards. Regular audits are undertaken throughout the year to assess compliance, including reviews of payroll information, contractual arrangements and employment records where appropriate.

Technology continues to play a key role in our assurance activities. Our mobile applications capture operative, task and timing data throughout site visits, recording attendance and activity in real-time. This information is integrated into our TotalView platform, providing enhanced visibility of field operations and enabling targeted and unannounced site audits. These audits remain an important mechanism for identifying potential indicators of modern slavery and ensuring that our standards are maintained across all areas of our supply chain.

We continue to work closely with our Field Teams to strengthen compliance and promote ethical working practices. This includes providing access to our Modern Slavery and Equality, Diversity and Inclusion policies, sharing best practice guidance and supporting smaller businesses and micro-enterprises in developing compliant recruitment and employment processes. Through this collaborative approach, we seek to raise awareness, improve standards and encourage a culture of responsible business practices throughout our supply chain.

Our dedicated Compliance Lead continues to drive compliance activity across the business and our Field Team network. Working closely with operational and supply chain teams, they support awareness initiatives, oversee assurance activities and help ensure that modern slavery risks remain a key area of focus across our operations.



Our Suppliers

Over the past year, we have continued to strengthen our approach to procurement and supplier management, recognising the critical role procurement plays in managing ethical, operational and modern slavery risks across our supply chain. Following changes to the leadership within Procurement, we undertook a review of our procurement operating model which resulted in a restructure of the procurement function. This has enhanced efficiency, strengthened accountability and created greater capacity to focus on supplier governance, risk management and strategic supplier engagement.

Our approach is underpinned by a commitment to work only with suppliers who align with our values and demonstrate robust and effective management of modern slavery risks within their own operations and supply chains. Central to this is our structured supplier onboarding process, within which modern slavery risk assessment remains a core component. Alongside standard compliance checks, all suppliers are required to provide detailed information on how they manage modern slavery risk. Where applicable, suppliers must submit a Modern Slavery Statement, which we assess against key criteria including organisational structure, governance arrangements, relevant policies, due diligence processes, risk assessments, training and the use of metrics to measure effectiveness. For suppliers below the reporting threshold, we require evidence of the controls they have implemented and assess these against recognised government guidance and industry good practice.

All suppliers are required to commit to our Supplier Code of Conduct as a condition of onboarding. This sets clear and non-negotiable expectations in relation to modern slavery, human rights and ethical practices across both their workforce and supply chains. Where suppliers do not initially meet these expectations, we take a structured and collaborative approach to address gaps, while maintaining clear standards regarding the requirements to work with Ground Control.

The restructured procurement team has enabled a more coordinated and consistent approach to supplier oversight. Procurement works closely with operational, compliance and supply chain stakeholders to ensure that supplier controls are applied consistently and proportionately according to risk. This approach has strengthened visibility across our supply chain and supported a more disciplined and data-driven approach to supplier risk assessment. As part of this framework, 100% of suppliers identified as higher risk are subject to enhanced due diligence, including detailed assessments of how modern slavery risks are identified, managed and mitigated within their businesses and wider supply chains.

We continue to apply a structured supplier tiering model to ensure our resources are focused where risk is greatest. Tier 1 suppliers, representing approximately 80% of annual supplier spend, are subject to regular Supplier Relationship Meetings, where modern slavery remains a standing agenda item. These discussions consider each supplier's approach to risk management, the effectiveness of their controls, changes within their supply chain and any actions required to strengthen compliance. Agreed improvements are monitored through formal action plans and periodic reviews.

Our ongoing monitoring arrangements continue to include visual audits during visits to supplier locations and operational sites. These assessments are conducted against a standardised checklist and provide additional assurance regarding supplier compliance and working practices. Findings are centrally logged and reviewed to identify trends, emerging risks and opportunities for improvement.

During the year, we further formalised our procurement governance framework by continuing to document and standardise modern slavery controls across the supplier lifecycle. This has helped ensure a consistent, transparent and auditable approach to identifying, mitigating and monitoring risks. Where potential risks are identified, we take a structured and responsible

approach to remediation. This includes enhanced due diligence, engagement with suppliers, targeted monitoring and, where necessary, escalation through our supplier governance framework. We recognise that effectively addressing modern slavery risk requires collaboration, transparency and a focus on supporting sustainable improvements while protecting vulnerable individuals.

We have not identified any confirmed instances of modern slavery within our supply chain during the reporting period. However, we remain vigilant and continue to apply a proactive, risk-based approach to supplier management, ensuring that our controls remain robust, consistently applied and responsive to evolving risks.

Looking ahead, we will continue to build on the progress made through the procurement transformation programme. Our focus will be on further embedding risk-based supplier management, enhancing supplier performance and compliance monitoring, developing our supplier risk intelligence and strengthening engagement with suppliers on ethical and responsible business practices. Through these actions, we will continue to improve transparency, resilience and accountability across our supply chain while supporting our commitment to preventing modern slavery in all its forms.



Training and awareness

Raising awareness and strengthening capability across our organisation continues to be a key focus. Over the past year, our Learning and Development team has continued to deliver an extensive programme of training and awareness activity, ensuring that our approach to modern slavery remains comprehensive, practical and embedded across the business.

Whilst we did not achieve our stretch target of 97% completion for mandatory modern slavery training during the reporting period, completion rates remained high across the organisation. The primary challenge related to a proportion of frontline operatives who have limited access to computers and digital learning platforms as part of their day-to-day roles. Recognising this, we have focused on ensuring awareness is delivered through a range of channels rather than relying solely on e-learning completion statistics.

Our approach combines both digital and in-person engagement to maximise reach and impact. Alongside mandatory e-learning modules for employees and Field Teams, we have increased our focus on operational audits, site visits and face-to-face engagement. These interactions provide valuable opportunities to discuss modern slavery risks directly with operatives, reinforce key messages, identify any concerns and ensure individuals understand how to report issues should they arise.

We continue to invest in building a highly capable and well-supported Learning and Development, Talent and People function, whose commitment to ethical and compliant practices is central to our approach. These teams play an important role in identifying and

managing modern slavery risks, particularly within recruitment, onboarding and workforce management. During the year, we also continued to provide guidance and awareness training for hiring managers, helping them recognise potential indicators of exploitation and reinforcing their responsibilities in delivering compliant and ethical recruitment practices.

For our Field Teams, who play a critical role in safeguarding within our supply chain, we have further increased face-to-face engagement through contract mobilisations, operational briefings, supplier meetings and site-based conversations. This approach has enabled us to reach individuals who may not routinely access digital systems while ensuring modern slavery awareness remains visible, relevant and practical.

Training continues to form part of our onboarding process, with all new starters required to complete modern slavery awareness training, supported by regular refresher activity. Alongside formal training programmes, we maintain a strong focus on ongoing communication, toolbox talks, operational engagement and awareness campaigns to ensure understanding is reinforced throughout the year.

While no instances of modern slavery have been reported during the reporting period, we remain vigilant. The commitment of our Learning and Development team, combined with increased operational engagement, audits and face-to-face discussions, helps ensure our people and Field Teams are equipped to identify potential risks, challenge poor practices and raise concerns with confidence where required.



"Effective modern slavery prevention relies on more than policies and processes. It requires people who are informed, engaged and confident to speak up. Over the past year, we have continued to deliver robust compliance training while also expanding our soft skills development programmes to strengthen communication, leadership and decision-making across the organisation. Together, these programmes help create a culture where ethical behaviour is understood, expected and actively championed by our people."

Jez Light, Learning and Development Director





Our recruitment process remains a critical control in managing modern slavery risk. Over the past year, we have taken a more structured and deliberate approach to strengthening both our capability and oversight, recognising that recruitment has at times been a challenging area, with high turnover and a previous model that did not consistently provide the level of rigour required.

Through this review, we identified that elements of recruitment leadership and delivery lacked the necessary operational alignment and robustness to effectively manage risk across a business of our scale and complexity. In response, we have fully integrated our Talent function into the HR structure, ensuring that recruitment is now firmly embedded within our broader People framework, with stronger governance, clearer accountability and closer alignment to divisional needs.

People Business Partners now play a central role in overseeing recruitment activity within their divisions, providing enhanced visibility of hiring activity and enabling risks to be identified and managed more effectively at a local level. This shift has strengthened control and consistency, ensuring recruitment is aligned to both business needs and our ethical standards.

We have also continued to invest in upgrading our recruitment systems and processes, including exploring the use of AI tools to enhance our controls. These tools are being deployed carefully to support consistency checks, validate candidate information and identify potential areas of concern earlier in the process. All outputs are subject to rigorous human review, with clear oversight from a dedicated systems lead to ensure data integrity, appropriate use of technology and consistent application of controls.

All candidates are onboarded through our digital Applicant Tracking and People systems, where candidate information, employment history and documentation are subject to structured review and audit. Our right-to-work process remains a key control, combining automated checks with manual verification to ensure appropriate rigour across all candidate types.

Alongside system and structural improvements, we have continued to strengthen capability across the business. Enhanced training has been delivered to both HR and hiring managers, ensuring they are equipped to identify potential risks, understand their responsibilities and consistently apply compliant and ethical recruitment practices.

As part of our commitment to responsible and inclusive recruitment, we continue to partner with organisations that support access to employment for individuals from more vulnerable groups, including care leavers, individuals with special educational needs and those with criminal convictions. Recognising the additional risks these groups may face, we ensure appropriate safeguards, support mechanisms and trained management oversight are in place throughout their employment.

Through these changes, we are strengthening the effectiveness, control and consistency of our recruitment processes. Our focus remains on embedding this more disciplined, HR-led approach, ensuring recruitment continues to act as a robust and well-governed control in mitigating modern slavery risk across our labour supply chain.



Labour Risk Assessment

We recognise that, as an industry, we continue to face challenges in improving diversity within many of our manual roles. This remains a sector-wide issue that will require sustained and collaborative effort to address. However, we continue to take proactive steps within our own recruitment and workforce practices to support progress in this area.

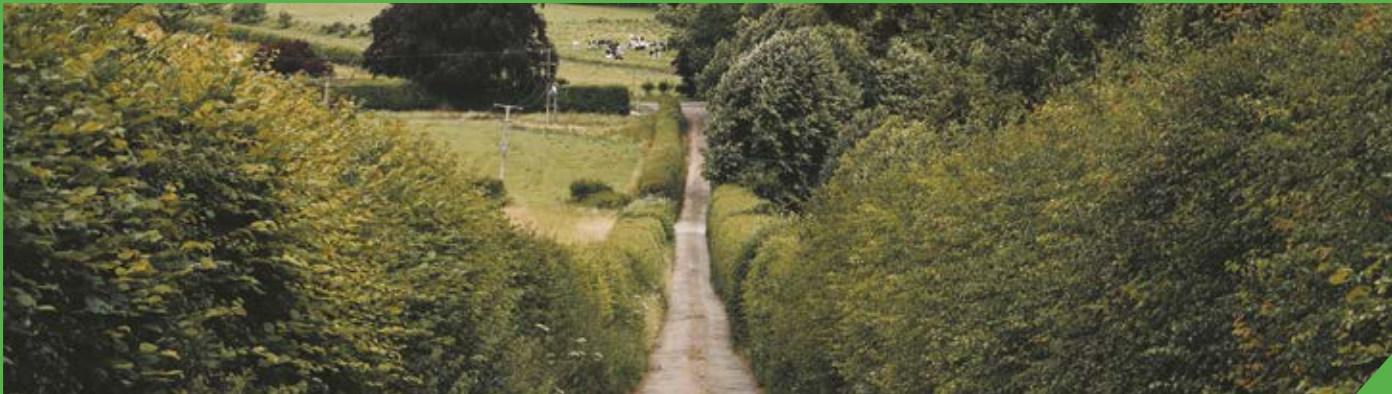
Over the past year, we have continued to build on our approach through our annual Labour Risk Assessment, enabling us to identify areas of potential vulnerability across our business and implement targeted actions to mitigate risk.

We recognise that our manual workforce can present a higher risk of exposure to modern slavery and exploitation, and this remains the core focus of our due diligence activity. We maintain robust audit and assurance processes to ensure all individuals are treated fairly, their rights are protected, and any potential risks are identified and addressed at an early stage.

While many roles within this part of our workforce are lower-skilled, we continue to invest in our people to support development, wellbeing and engagement. This includes structured training opportunities, ongoing support through operational management, and clear pathways for raising concerns.

We also continue to support those working independently through strengthened lone worker arrangements, including the use of our Stay Safe app, regular manager engagement and structured operational oversight. In addition, our ongoing health surveillance programme enables us to proactively monitor and support the wellbeing of employees, including those who may be more vulnerable.

Through this continued focus, we are strengthening our understanding of workforce risk, ensuring appropriate controls remain in place and maintaining a proactive, welfare-led approach to protecting our people.



Conclusion

Over the past year, we have continued to maintain a strong and disciplined focus on monitoring and addressing modern slavery risks across our business and supply chain. We continue to work closely with our employees, Field Teams and partners to identify, assess and mitigate both known and emerging risks, recognising that the risk landscape continues to evolve and requires ongoing attention.

Our zero-tolerance approach to modern slavery remains firmly in place, underpinned by a strengthened framework of policies, processes and oversight. Through continued refinement of our internal controls, risk assessments and reporting, we continue to work to enhance our ability to identify concerns early and respond in a timely, consistent and effective manner.

Our focus will remain on embedding this approach more deeply into our operations, ensuring that modern slavery prevention is fully integrated into how we operate day to day. By maintaining this level of rigour and accountability, we are continuing to strengthen our ability to manage risk proactively and ensure that addressing modern slavery remains a core part of how we do business.



This statement was approved by the Board of Ground Control Holdings Ltd on
8th September 2026 and signed by Jason Knights, Managing Director, on its behalf.



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