APLEONA

Modern Slavery Statement 16/02/26

1. INTRODUCTION

Apleona UK Limited and its subsidiaries within the Group of companies remain fully committed to compliance with the Modern Slavery Act 2015. This statement sets out the steps we are taking to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

This statement relates to actions during the financial year 01 January 2025 to 31 December 2025.

It is a fundamental policy of Apleona to conduct its business with honesty and integrity and in accordance with the highest standards of ethics and fair dealing. We know that slavery, human trafficking, servitude and forced labour represent global challenges for governments and businesses. We will combat all forms of modern slavery, human trafficking and exploitation of employees throughout our operations and within our supply chain. We have developed a Modern Slavery and Trafficking Policy which applies to all our staff and our supply chain partners to clearly communicate our expectations on this issue.

Our parent company, Apleona Group, participates in the EcoVadis Index, a global sustainability ratings provider, to measure our performance in environmental management, labour and human rights, ethics and sustainable procurement across the entire business. We retained our gold rating under EcoVadis Index and we will continue to use this benchmarking tool to drive improvements in our processes and performance year on year.

2. ORGANISATIONAL STRUCTURE, BUSINESS AND SUPPLY CHAINS

References to Apleona UK Limited in this statement includes Apleona UK PPP Limited, Apleona UK Limited, Combined Technical Solutions Limited, JCW Group Limited, JCW Energy Services Limited, Corrigenda Limited, Corrigenda Holdco Limited and all other subsidiaries within the Group of companies as incorporated from time to time. Apleona UK Limited is a provider of integrated facilities management services. We provide hard and soft services and serve both the public and private sectors – from pharmaceutical, healthcare, retail and manufacturing environments to educational establishments and corporate offices. As a UK-based business we have 17 offices in the UK and we employ approximately 1,750 personnel to deliver service solutions that work for our clients.

The organisational structure and leadership are driven by our UK Management Board where processes, procedures and objectives are developed and communicated to the business to be implemented and followed.

Our supply chain is managed by our Procurement department and involves a detailed assessment of all our contractors and suppliers before any work or payment is awarded. Our supply chain includes sub-contractors and suppliers which are based in the UK and assessed through an electronic system with several checks and balances before they are allowed to work within our portfolio of contracts. The business operating model is the supply of goods and services on time, at the right price and which meets

the relevant ethical and quality standards.

We also recognise the heightened standards introduced by the Procurement Act 2023. To safeguard our position as a trusted partner, we have updated our Supplier Code of Conduct to include mandatory disclosure of subcontracting tiers in high-risk categories. Suppliers found to be providing misleading information regarding their labour practices are now subject to immediate suspension and potential debarment from our supply chain, reflecting our commitment to the transparency required by current UK law.

3. ORGANISATIONAL POLICIES

All our policies are agreed by the UK Management Board. They are designed to influence good behaviour and are communicated via our internal communication channels. They are managed through our ISO 9001 certified management system under document control.

Examples of relevant policies are detailed below:

- Modern Slavery Statement
- Modern Slavery and Trafficking policy
- Recruitment policy
- Supplier code of conduct
- Employee code of conduct
- Whistleblowing policy
- Equality policy
- Grievance procedure

JCW and Corrigenda are operating under their own legal entity and as such they follow their own policies. Nevertheless, as part of Apleona Group they fall under the Group Compliance Guidelines which cover Group Directive on Integrity, Group Code of Conduct and Group Directive on Third Parties.

4. DUE DILIGENCE

Reflecting the United Nations Guiding Principles on Business and Human Rights, our due diligence activities to combat Modern Slavery and Human Trafficking are risk based. Our supply chain completes a pre-qualification contractor / supplier assessment where our supply chain partners are formally assessed across a range of questions to ensure compliance. Additionally, they sign up to our terms and conditions which requires them to commit to our policies and confirm that they are not involved in modern slavery and trafficking.

From a Human Resource perspective, we have robust recruitment procedures in place to check that candidates have the right to work in the UK before they are offered a role within our company.

We actively seek to identify non-compliance through contract reviews, regular meetings and whistleblowing.

5. ASSESSING AND MANAGING RISK

We maintain and regularly review our Group Risk Register, which identifies prospective and active risks within the business, and we endeavour to address these in a prompt manner as and when they arise. We have appropriate controls in place to effectively manage the risks listed in the Register and appropriate training is provided to colleagues throughout the year.

6. PERFORMANCE INDICATORS

During 2025, the following key performance indicators and targets were monitored and completed:

- We included actual or suspected cases of modern slavery in the list of qualifying disclosures in the Whistleblowing Policy.
- We developed an escalation procedure, supported by guidance with allocated roles and responsibilities, should there be an incident of modern slavery reported.
- All HR and Procurement colleagues completed the new e-learning module on modern slavery.
- We conducted 10 modern slavery assessments in our supply chain.
- We completed an additional manual check through the payroll system, for any duplicate bank account details. This is repeated on an annual basis as a minimum.

In 2026, we are committed to:

- Review Corrigenda and JCW's Recruitment and Whistleblowing policies to align with Apleona's Policies.
- Modern Slavery e-learning module to be rolled out to key HR and Procurement personnel in JCW and Corrigenda.
- Roll out the Whistleblowing helpline and portal in JCW and Corrigenda.
- Repromotion of Whistleblowing helpline and portal via our Townhall call and our Intranet.
- Become part of recognised and industry led networks, working together to raise awareness of and tackle modern slavery issues.
- Review the PQQ process to strengthen our understanding of any high-risk supply chain partners.
- Conduct additional 10 modern slavery self-assessments in our supply chain.

7.TRAINING

We have developed and launched a new e-learning module on modern slavery for our employees.
In 2025, our HR and Procurement colleagues and additional 1,280 employees completed the Modern Slavery training.

We have detected no instances of modern slavery or human trafficking during the financial year 01 January 2025 to 31 December 2025.

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This statement is published on our website with a link on our homepage.

As a UK Management Board we approve the above statement and are satisfied that Apleona UK Limited is taking appropriate steps to ensure that modern slavery is not taking place in any parts of the business or in its supply chain. We will continue to monitor our actions on an ongoing basis.

Adrian Connor
Managing Director, UK