

Modern Slavery and Human Trafficking Statement

June 2026 (For FY2025)

Introduction

Bates Office Services Ltd.'s has a zero-tolerance approach to any form of modern slavery and human trafficking. This statement shows Bates Office Services Ltd.'s commitment to preventing slavery and human trafficking in all areas of its business and supply chain. This statement addresses the UK Modern Slavery Act 2015 for the 2025 financial year.

We are committed to acting ethically and with integrity, and to implementing effective systems and controls to ensure modern slavery is not taking place.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Bates Office Services Ltd. has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our own organisation or our supply chain.

Bates Office Services Ltd. Organisation and Supply Chain Structure

Bates Office Services Ltd. provides public and private sector organisations with office productivity supplies. Including, but not limited to; Office Stationery, Office Furniture, PPE & Workwear, Document Management, Confidential Waste, Managed Print Solutions, Design & Print, Digital Solutions and Total Building Solutions.

Bates Office is an Employee Ownership Trust, with a trustee board, a Board of Directors and an employee committee. Bates Office operates three distribution centres, and the majority of our workforce are based at the sites, with some staff working from home. The sourcing of goods is overseen by Procurement Director who guarantees that our internal procedures are updated to ensure adequate procurement pricing, prompt payment and good planning.

Due to the nature of Bates Office's services, supplier relationships and contracts are long-term and fixed. Bates Office works collaboratively with our suppliers to comprehend the structure of our supply chain beyond Tier 1. Bates Office has adopted a policy that requires our suppliers and their supply chain to be transparent in reporting and hold the same ethos.

Dependent on business category, Bates Office sources direct from manufacturers, wholesalers and dealers. Our supply chains involve a network of local and global suppliers, contractors, and wholesalers. Many of the products we sell are sourced from reputable suppliers who are based in the UK and the European Union. We also source a number of products from suppliers based in the following territories: Asia, North America, and other non-EU European countries.

We have enhanced our supplier management system with onsite audits, and we have implemented policies and procedures to support our risk based due diligence when selecting suppliers, which includes the consideration of modern slavery statements and also the use of SEDEX.

Policies

Bates Office has a suite of policies which form a framework for acting ethically and with integrity in all our business relationships. These allow us to enforce effective systems and controls to mitigate modern slavery risks in our supply chains. These include and not limited to

Ethical Working Statement

This policy standard sets out the detailed requirements and minimum expectations of our policy of sustainable and ethical procurement. Specifically, it addresses the expectation that our staff and suppliers have a natural respect for our ethical standards in the context of their own culture and that relationships with our suppliers are always based on the principle of fair and honest dealings. The same principle of fair and honest dealings must be extended to all others with whom our suppliers do business, including employees, sub-contractors and other third parties and their local communities.

Modern Slavery Policy

This policy outlines our approach to understanding modern slavery risks within our business and the measures we have put in place to ensure there is no presence of slavery or human trafficking in our business or supply chains.

Supplier Code of Conduct

The Ethical Conduct Code's aim for suppliers is to establish standards of ethical behaviour and business conduct for all those customers who acquire the finished products of Bates Office. We want this code to regulate the way we relate with our suppliers working with transparency and objectivity. It is our purpose that the market distinguishes us for our honesty, transparency, and consistency in business conduct, and that we be recognised as people who reaches out objectives in a fair and respectful way.

Anti-Bribery and Anti-Corruption Policy

Bates Office strictly prohibits all forms of bribery and corruption and complies with all laws in which Bates Office Services Ltd. operate. This policy supports Bates Office commitment to carrying out its business functions in an honest and ethical manner and to observing provisions of the Bribery Act 2010, in respect of its conduct within the UK.

Whistleblowing Policy

Bates Office has a policy which encourages employees and others who have serious concerns about any aspect of the business work to come forward and voice those concerns. Upon receipt of a report, the Compliance team will ensure that an appropriate investigation and response.

Training and Awareness

We provide training to relevant employees to ensure:

- Understanding of modern slavery and human trafficking risks.
- Ability to identify and report concerns.
- Compliance with this policy across departments.

Steps we plan to take in the next twelve months

We intend to maintain our current approach, while continuously adapting and evolving it in line with the growth of our business and the ongoing development of our due diligence processes relating to Modern Slavery and Human Trafficking.

- Deliver further and refresher training on the Modern Slavery Act for all relevant staff involved in the procurement of goods and/or services, to ensure continued awareness and compliance with legal and ethical obligations
- Work with supplier from high-risk countries to ensure that they are on SEDEX and are sharing SMETA audits of the manufacturing sites.
- We will continue the programme of random spot checks introduced last year, under which we select suppliers at random to undergo Modern Slavery compliance checks and/or audits. These reviews are designed to assess and ensure ongoing compliance with our Modern Slavery and Human Trafficking policies, helping us identify any potential risks or areas for improvement across our supply chain.

Policy Review

This policy will be reviewed annually or whenever significant changes occur, to ensure its continued relevance and effectiveness.

This statement is made pursuant to section 54(1) of the **Modern Slavery Act 2015** and constitutes our slavery and human trafficking statement for the year, from the date of this document.



David Taylor
Managing Director

15th June 2026