

Modern Slavery Policy Statement

Purpose

This policy outlines Bates Office Services Ltd.'s commitment to preventing slavery and human trafficking in all areas of its business and supply chain. 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.

Scope

This policy applies to:

- All employees, directors, officers, and temporary workers.
- All contractors, suppliers, and other business partners.

Our Commitment

Bates Office Services Ltd. strictly prohibits the use of modern slavery in all its forms, including:

- Forced or compulsory labour
- Human trafficking
- Child labour
- Debt bondage and servitude

We strive to ensure that all our operations are free from modern slavery risks through ongoing due diligence and risk management.

Due Diligence and Risk Assessment

Our code of conduct and self-assessment questionnaire require all suppliers to implement effective due diligence procedures in respect of their own supply chains, including their subcontractors and suppliers. This is to ensure, as far as reasonably possible, that slavery and human trafficking are not present at any level of the supply chain—which we regard as an extension of our own.

Suppliers must also confirm that they do not purchase raw materials, components, or products from countries subject to sanctions, or from sources known to use forced labour.

Bates Office Services Ltd continue to identify and mitigate risks, and in line with our previous communications, we have written to all live suppliers requesting confirmation of the steps they have taken to prevent modern slavery and human trafficking in their operations and supply chains. This

process will now be a standard requirement for all new suppliers, and we will continue to conduct reviews of existing suppliers.

This approach reflects our commitment to responsible sourcing and the protection of human rights across all tiers of our supply chain.

We conduct risk assessments to:

- Identify high-risk areas in our supply chain and operations.
- Evaluate the risk of modern slavery occurring.
- Monitor and review existing suppliers and business partners

Supply Chains

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. These suppliers are selected through a due diligence process that includes compliance checks with our Supplier Code of Conduct and Modern Slavery policies.

Where sourcing takes place from higher-risk regions, we take additional steps to assess and monitor compliance, including requesting third-party audit reports, reviewing certifications and conducting regular risk assessments.

Supplier Standards

Suppliers are expected to:

- Not use any form of forces, compulsory, slave or child labour
- Allow their employees to work voluntary
- Provide each employee with an employment contract that contains reasonable mutual standards
- Not withhold employee's salaries for any reasons
- Not ask any employees to surrender their passports, or work permits as a condition of employment.
- Allow Bates Office Services Ltd. to audit or review practices if necessary
- Immediately report any actual or suspected instances of modern slavery.

Steps we take to address and migrate with risks of Modern Slavery

We aim to.

- Include modern slavery conditions/criteria in specification or tender documents wherever applicable
- Train all staff in slavery and human trafficking to help them spot the signs and know how to report it
- Evaluate specifications and tenders with appropriate weight given to modern slavery points
- Encourage all our suppliers and contractors to take their own action and understand their obligations to these requirements.

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
- We are in the process of reviewing and updating our Supplier Code of Conduct to ensure it reflects our commitment to greater transparency across our supply chain. Due to unforeseen business challenges since our previous statement, this remains an ongoing piece of work. However, we are committed to completing this review ahead of our next Modern Slavery Statement
- 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.

Reporting Concerns

All individuals are encouraged to raise concerns about modern slavery in our operations or supply chains. Reports can be made to:

- Your line manager
- Human Resources
- Whistleblowing channels

Policies

Bates Office Services Ltd operates the following policies for identifying and prevent slavery and human trafficking within our supply chain.

- Whistleblowing – we encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential way of reporting to protect the identity of the whistle-blowers

- Supplier code of conduct specifies our approach to ensuring that our supply chain also adhered to the standards we expect.
- Supplier Self-Assessment questionnaire

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

23rd June 2025