

Regnology

Statement on Modern Slavery 2025

Version 2.0



1 About us and our mission

Regnology Group (“Regnology”, “we”, “our”, “us”) is deeply committed to conducting business ethically and responsibly, a principle that is at the core of our Code of Conduct. Upholding the highest standards of ethical conduct and human rights across our operations and supply chain is a priority for us. We have a zero-tolerance approach to, and strongly condemn, modern slavery, human trafficking, child labour, forced or bonded labour, and servitude in in any form and in any context, in any geographies in which we operate, and within our global supply chain.

This statement is a direct reflection of the principles articulated in our Code of Conduct and our Supplier Code of Conduct, and is written in accordance with the UK Modern Slavery Act 2015. We are publicly committed to adhering to and incorporating the principles of the UN Guiding Principles on Business and Human Rights, the UN Sustainable Development Goals, the principles of the UN Global Compact, the International Bill of Human Rights, and the International Labour Organisation’s (ILO) Declaration on Fundamental Principles and Rights at Work in all our operations and across our value chain.

In the provision of our services, Regnology primarily collaborates with suppliers of IT services, business support services, marketing materials, and office maintenance supplies. These are not typically high-risk for human rights violation. Nevertheless, we continuously monitor risks related to modern slavery and human rights violations and actively work to improve our policies, processes and governance structures to reflect our ongoing commitment to transparency and accountability.

2 Our achievements

We are proud of the progress we have made in strengthening our approach to preventing modern slavery in our operations and supply chain. The following achievements reflect our ongoing commitment to meaningful action, transparency and continuous improvement.

1. Company-wide policies and processes

- We implemented or maintained and annually reviewed all key policies relevant to human rights and modern slavery, including our Code of Conduct, Supplier Code of Conduct, Health and Safety Policy, Diversity & Inclusion Policy, Procurement Policy, Anti-Bribery and Anti-Corruption Policy, etc. In particular, we have strengthened our Code of Conduct and Supplier Code of Conduct to clearly outline our commitments and to ensure our suppliers act in accordance with such standards.
- We ensured alignment of our policies with international standards, including the UN Guiding Principles on Business and Human Rights and the ILO Core Conventions as part of our annual review.

- We enhanced our supplier selection process to strengthen our commitment to maintaining an ethical supply chain, by explicitly including in our assessments questions to validate the suppliers' standing in regards to international best practices as well as including a compliance clause in our supplier contracts.
- We maintained our commitment to conducting business ethically by requiring all our employees to complete our annual training on Regnology's Code of Conduct and acknowledge their commitment to adhere by its rules.
- We strengthened internal governance by clearly defining a policy governance process and specific roles and responsibilities for managing modern slavery risks.
- We formalised escalation and remediation protocols to ensure timely and appropriate responses to identified risks or potential incidents, including enhancements to our Whistleblowing Policy and the associated whistleblowing channel, as well as enhanced our internal process for handling and investigating whistleblowing disclosures.

2. Third party Due Diligence

- We enhanced our Due Diligence Policy to ensure that our supply chain and every aspect of our business organisation is free from modern slavery and human trafficking.
- We improved our Know-Your-Customer/Supplier process to identify, address, mitigate and monitor potential risks associated with our supply chain, as mandated by our Due Diligence Policy.
- We revised and strengthened the risk-based due diligence monitoring process for new and existing customers, suppliers, and partners with a specific focus on high-risk geographies and sectors as identified in our Due Diligence Policy.
- We revisited our contractual templates to strengthen our commitment to compliance and ensure our partners, whether customers or suppliers, uphold similar commitments.
- We maintained a supplier onboarding process which requires suppliers to acknowledge and comply with Regnology's Supplier Code of Conduct or equivalent policies as well as to comply with Regnology's contractual compliance clauses or similar standards in their operations.
- We embedded sustainability and human rights related principles further into our supplier selection process.

3. Training and awareness

- We provided ongoing mandatory training sessions for all employees regarding our Code of Conduct as well as any related internal policies.
- We enhanced our online training curriculum for employees to focus on additional policies connected to broad human rights topics, including but not limited to Health

and Safety Policy, Diversity & Inclusion Policy, Procurement Policy, Anti-Bribery and Anti-Corruption Policy.

- We provided tailored guidance and resources to high-risk teams, including procurement and supplier-facing teams. We also delivered speaker-led trainings to enhance knowledge of high-risk teams and offer the possibility to clarify any questions.
- We continued to enhance our fully confidential whistleblowing system, the “Regnology TrustLine”, for reporting any potential concerns, including any suspicions of modern slavery. As outlined in our Whistleblowing Policy, all reports are treated with the utmost confidentiality, and we have a strict non-retaliation policy to protect those who come forward.
- We monitored completion rates and training effectiveness to support continuous improvement and publicly reported on these rates in our Sustainability Report available on our website to enhance transparency.

4. Enforcement

- Any violation of these standards and requirements by a supplier may result in contractual termination.
- Any violation of these standards and requirements by an employee (this refers to all individuals, including selected consultants and contractors, as applicable, who are under terms of employment, work contracts, or apprenticeships with Regnology) may result in disciplinary action, up to and including termination of employment.

3 Our ongoing commitments

Our commitment is to maintain and enforce these principles and the overall compliance culture of integrity and responsibility. We strive to continuously strengthen our policies and governance processes, focusing on effective implementation of, or alignment to, applicable laws, regulations and international best practices, including those highlighted by the United Nations and the International Labor Organization.

In the year ahead, we will place particular emphasis on enhancing our due diligence process to better identify and assess modern slavery risks within our supply chain. We also aim to review and build upon our existing training programs, ensuring our employees and especially our procurement teams are equipped with the awareness to support these goals. Regnology will continue to review its human rights efforts against international best practices to understand how we can further strengthen our commitments, increase transparency in our global supply chain, and report on our progress. These actions form an integral part of our wider Environmental, Social, and Governance (ESG) strategy, reflecting our dedication to sustainable and ethical business practices.

Regnology's Modern Slavery Statement for the financial year ending 31 December 2025 is approved and owned by Regnology's CEO and leadership team and is made pursuant to section 54(1) of the UK Modern Slavery Act 2015.