

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31 March 2026.

Ubisecure Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational structure

Ubisecure Ltd and has business operations in the United Kingdom, as well as:

- Sweden
- Finland
- United States of America
- Poland

We operate in the information technology sector. The nature of our supply chains is as follows: we work with a number of suppliers, who provide us with goods, such as equipment for our premises, and services, such as outsourced business processes, IT and security software.

For more information about the Company, please visit our website: www.ubisecure.com.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- Recruitment and selection policy - Our recruitment process is in place to ensure that we employ people who demonstrate our values, have high ethical standards, are the right people for the right role and fundamentally, meet the requirements of being able to work in the UK.
- Supplier code of conduct - Our suppliers must demonstrate that they have taken reasonable and proportionate steps, having regard to the nature of their business, to identify potential high and medium risks of slavery, servitude, forced and compulsory labour or human trafficking in their supply chains.
- Whistleblowing policy - Our whistleblowing policy seeks to prevent modern slavery by ensuring all individuals including staff, suppliers, partners, investors or contacts know how to formally express a concern they have regarding Ubisecure's conduct or that of our employees.
- Employee code of conduct - The staff code of conduct seeks to reinforce Ubisecure's expectation of our staff members, in relationship to the treatment of others, ensuring that the values of dignity, respect and equality permeate their behaviours and conduct within the workplace.

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

Moving forward in 2026 we will be incorporating appropriate consideration of modern slavery in our due diligence and tendering processes and our supplier management arrangements. All in-scope suppliers will be required to provide a link to their annual statements. Ongoing supply chain partner management will include annual due diligence checks.

Suppliers will be required to sign up to a code of conduct covering:

- commitment to paying at least the local minimum wage
- commitment to reasonable working hours and conditions
- conducting appropriate risk assessments
- having procedures in place for dealing with any concerns or incidents of modern slavery or human trafficking (including protecting whistleblowers)

Effectiveness | Risk and Compliance

Country risks: Our exposure to the risk of modern slavery in high-risk countries (where protection against breaches of human rights is limited) is low. Our supply chains are not generally characterised by second tier subcontracting.

Sector risks: Due to the nature of our services, our exposure to the risk of modern slavery in high-risk sectors e.g. hospitality, manufacturing and construction is low risk.


Vulnerable groups: Our engagement with vulnerable groups who could be at higher risk of modern slavery, including women, migrants and refugees are low-risk.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our

Training our staff

While we have not done anything specific during 2025, moving forward we will provide training for staff and advisers and raise awareness and understanding in the business community more widely through, for example, our e-communications, websites and events.

The statement was approved by the board of directors.


Thomas Edwards, Executive Chair
Ubisecure Ltd


Date