



## **Radiocom's Systems Ltd Modern Slavery Statement**

### **Introduction**

Slavery is a term used to include slavery, servitude, forced and compulsory labour, bonded and child labour. Victims are coerced, deceived, and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

Slavery and human trafficking are illegal and violate fundamental human rights. Forms

of modern slavery may include, but are not limited to, withholding of passports, being forced to work against a person's will, depending on the employer for housing, food, and other necessities, being recruited through some form of debt arrangement, such as an advance or loan, and limitations on movement of workers.

Radiocom's not only prohibits the use of modern slavery and human trafficking in our operations and supply chain but is actively engaged in helping Government Agencies to combat the perpetrators of these crimes many of which originate overseas.

## **Corporate Responsibility**

We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

Radiocom's Systems Limited's turnover now exceeds £36 million, the threshold at which a company is required to publish a Modern Slavery Statement under Section 54 of the Modern Slavery Act 2015 (MSA). The Company takes its responsibilities in this area very seriously and therefore sets out in this Statement the processes and procedures it has in place to prevent slavery and human trafficking.

We expect that our suppliers will hold themselves and their own suppliers to the same high standards, respect local laws and customs along with meeting international laws and regulations. We will never knowingly deal with any organisation which is connected to slavery or human trafficking.

## **Business and Organisation Overview**

Radiocom's currently employs people only in the UK and one of the most important parts of our onboarding process is to ensure that each employee has the legal right to work here.

Radiocom's purchases goods and to a lesser extent services from the UK and other countries.

## **Governance**

Overall governance and monitoring of social sustainability topics, including human rights work, sits with the board of directors.

## **Organisation structure and supply chain**

Radiocom's Systems Limited operates from locations in the UK and purchases goods and services, including the design, supply, installation, hire and maintenance of voice and data communications equipment. Our supply chain includes suppliers based in the UK and internationally. We recognise that risks may increase in labour-intensive supply chains, outsourced manufacturing, and higher-risk geographies.

## **Risk Assessment Approach**

We assess modern slavery risk within our operations and supply chain using a risk-based approach that considers factors such as supplier location, sector and labour intensity, use of agency labour, subcontracting, and the nature of the goods and services provided. We review risk at least annually and when there are material

changes to suppliers, countries of origin, or operating context. Where higher risk is identified, we apply enhanced due diligence and monitoring.

## **Operational Policies**

As part of our commitment to combating modern slavery, and to conduct business ethically and transparently, along with mitigating the risk of non-compliance, we have the following policies within our organisation:

- Anti-Slavery and Human Trafficking
- Whistleblowing
- Bullying
- Diversity, Inclusion and Equal Opportunities

Our policies also invite all staff to contribute to the development of processes and provide suggestions as to how the company may improve its governance and risk management framework, processes, and controls.

Our whistleblowing policy guides individuals who wish to report any concerns or potential violations of our policies, including our anti-slavery and human trafficking policy. We are pleased to confirm that no incidents have been raised or reported to date.

Company policies are reviewed and updated regularly to confirm content remains relevant and consistent with the Company's strong commitment to protecting human rights.

## **Recruitment Practices**

We operate to high ethical business, employment, and recruitment standards. We recognise that responsible recruitment is an essential tool in combatting modern slavery and preventing human trafficking. Our internal recruitment standards acknowledge the importance of robust recruitment practices and serve as a reference point for management and employees.

To mitigate potential risks associated with slavery and human trafficking, we prioritise direct recruitment of staff and limit our use of temporary workers or those sourced through an intermediary or employment agency.

In instances where employment agencies are occasionally engaged for recruitment purposes, we undertake established diligence procedures, including but not limited to background and reference checks, before entering into any contractual agreements with an agency.

## **Due Diligence Processes**

The Company strives to maintain the highest standards of ethical integrity and expects the same of its business partners, employees, and affiliated parties.

We assess suppliers to ensure they can support the business and take steps to consider any areas of risk. The Company always seeks to partner with suppliers who share our strong commitment to upholding human rights and adhering to international labour standards.

We apply proportionate due diligence to suppliers and labour providers, which may include:

- supplier onboarding questions on labour standards, right to work, and subcontracting
- contractual requirements prohibiting modern slavery and requiring suppliers to maintain appropriate controls and records
- risk-tiering suppliers and applying enhanced checks for higher-risk categories
- requiring corrective action plans where issues are identified, with time-bound actions and follow-up
- terminating relationships where remediation is not achieved or where serious breaches are identified.

## **Management And Compliance**

The Company's risk appetite is determined by the Board. We will not tolerate slavery or human trafficking within any part of our business or within our supply chains.

Any allegations made about modern slavery within the company, or our wider supply chain are escalated internally and investigated without undue delay. Depending on the severity of the violation, potential actions available range from; discussions with suppliers around remediation and/or termination of the contract.

Concerns relating to modern slavery, labour exploitation, or human trafficking can be raised through line management or the whistleblowing process. Reports will be handled sensitively and investigated promptly. Where issues are identified, we will work with relevant parties to support remediation, including corrective actions, and will consider suspension or termination of supplier relationships where appropriate.

While modern slavery can be found among any population, we recognise that certain groups are particularly vulnerable to the risks of modern slavery, including:

- Domestic and foreign migrant workers.
- Contract and agency workers
- Vulnerable populations (e.g., refugees).
- Young or student workers.

We also recognise a heightened risk of modern slavery in factories located in China.

We actively manage our relationships with third-party agents and suppliers to mitigate any potential risk of modern slavery. The Company expects those who are charged with providing products or services to conduct robust checks on any potential new employee, including eligibility to work in the relevant country, to safeguard against human trafficking or individuals being forced to work against their will.

Radiocom's is proud of its culture and corporate ethos, and the collaborative relationships our staff actively maintain with customers and suppliers externally. Our organisation's culture and the approach we take when dealing with customers, partners, advisors, and other third parties have been instrumental in ensuring that we have low levels of staff turnover and few changes in the supply chain.

We understand that geopolitical events have created, and continue to create global economic and social disruption, putting vulnerable groups identified above at greater risk of exploitation. The company recognises that the ongoing economic and labour market changes resulting from such geopolitical events will likely exacerbate underlying factors driving modern slavery, including poverty, limited access to decent work opportunities, lack of quality education, and the prevalence of the informal economy.

The Company is committed to taking practical steps to proactively mitigate existing and emerging modern slavery risks within our supply chain. All key business decisions are based on risk analysis, and we will continue to make decisions by putting employee and supplier safety first. With all our continuing operations, this will be conducted in line with local laws, guidelines, and best practices.

## Training

The Company's employees are essential in helping to identify and prevent modern slavery in our supply chain.

The company's formal training and induction processes for new staff are firmly established. The standards and behaviours expected of our employees are detailed within several policies and codes of conduct, in addition to those listed above. All new employees have access to company policies as part of an induction and participate in training as required.

All staff receive annual refresher training to remind them of their duty and legal obligation to escalate any matters of concern in relation to human rights abuses, in line with company policies. All our employees are encouraged to identify and report any potential breaches of the organisation's policies within the wider understanding of whistleblowing.

## Key Performance Indicators

During 2026/2027, we will monitor the effectiveness of our human rights and modern slavery due diligence through the following performance indicators:

- Number of suspected instances of modern slavery reported, investigated, and escalated (including instances raised through our whistleblowing and 'Raise Concerns' processes).
- Completion rates for modern slavery training for relevant employees
  - percentage of higher-risk suppliers completing due diligence and contractual commitments
  - number of supplier assessments, audits, or targeted reviews completed (where applicable)
  - number and outcomes of concerns raised, including corrective actions implemented and closed.

## Commitment

As a purchaser of goods and services globally, we understand that there is a risk of modern slavery taking place in supply chains. Having considered a range of factors, including the nature of our products, the sector in which we operate, the various company policies and procedures in place, and the lack of instances noted to date, we believe that the company is at very low risk of exposure to slavery and human trafficking. We are not aware of any areas of our operations and supply chain where there has been a breach of the Modern Slavery Act 2015. Recognising that the human rights risks may change over time as the business enterprise's operations and operating context evolve, we will continue to:

- Re-evaluate the exposure to the risk of modern slavery occurring in our supply chain.
- Review and enhance our governance and risk management frameworks.
- Monitor external adviser independent assessments, due diligence and assurance work to ensure we comply with legal and regulatory obligations.
- Apply appropriate risk-based due diligence processes to mitigate risk of non-compliance with the Act.
- Continually review our induction and training programmes to support our zero-tolerance approach to human rights abuses.
- Continue training our Board, executive leadership team, and key members of the procurement and supply chain teams to build on their understanding.
- Work with stakeholders to develop further key performance indicator metrics as a tool to monitor compliance with the company's governance frameworks and policies.

## Looking Ahead

We have set key aims for 2026/2027, including:

- Continue to review and take steps to identify and address modern slavery risks within our operations and supply chain.
- Over the coming years, we will increase our efforts to strengthen best practice and traceability across our supply chain, in line with our ESG commitments. We believe our focus on enhanced supply chain monitoring will further strengthen our ability to identify and combat modern slavery.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps Radiocomms Systems Limited has taken during the financial year 2025 to prevent modern slavery and human trafficking in our business and supply chains. This statement was approved by the Board of Directors and is signed on behalf of the Board.

**Signed by:** Mark Blythe

A handwritten signature in blue ink, appearing to read "Mark Blythe", followed by a horizontal line.

**Job Title:** Managing Director  
**Date:** 03/03/2026