

ROUTE 101 – MODERN SLAVERY POLICY STATEMENT

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25/06/2025	5.1	Sarah-Jane Singh	Major update

MODERN SLAVERY ACT 2015 POLICY STATEMENT

This statement sets out Route 101's actions and policies taken to mitigate and understand modern day slavery and human trafficking policy. It represents a formal policy document and guidelines that outlines our commitment to preventing and combating modern slavery in our operations and supply chains.

This Policy is reviewed within each Financial Year, and review would take place earlier if there were any relevant instances reported within the supply chain or directly in relation to Route 101. To date there have been no instances of modern slavery or human trafficking concerns raised to us during the Financial Year ending 2024, or any previous Financial Year.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour (including child labour), debt bondage, and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Route 101 has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with any disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes. We check and insist partners include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

1. Responsibility For This Policy

Route 101 has overall responsibility for ensuring this policy complies with our legal and ethical obligations, international standards and conventions, and that all those under our control comply with it. We have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this statement and are given adequate and regular training on it and the issue of modern slavery in supply chains. Stakeholders are invited to comment on this Statement and suggest ways in which the associated policies and practices might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the Managing Director who owns this statement.

We will achieve these aims by our initiative to identify and mitigate risk in the following ways (but not limited to):

- Stringent vetting and investigation of our supply chain, including continued due diligence procedures for all suppliers.
- Continual audit and review of our practices for checking all employees are paid at least the minimum wage and have the right to work.
- We encourage the reporting of concerns and the protection of whistle blowers.
- Route 101 will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We require all subcontractors to have a compliant Modern Day Slavery Policy and for all those in our supply chain and contractors comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been informed on the statement, and its contents and aims

2. Key Performance Indicators

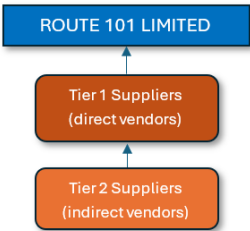
To measure our progress in tackling modern slavery, Route 101 monitors several key performance indicators (KPIs), including the frequency and outcomes of supplier business reviews, the completion rate of staff training on modern slavery awareness, the number of concerns raised through our reporting mechanisms, and the timeliness and effectiveness of our responses. We also review supplier compliance with our anti-slavery requirements through supplier management reviews and due diligence checks. These KPIs help us assess the effectiveness of our approach and identify areas for continuous improvement.

3. Supply Chain Mapping

To better understand the structure of our supply chain, Route 101 undertakes a mapping process that identifies and categorises suppliers by tier, geography, and service type. Risk levels are assessed based on industry, location, and workforce characteristics, and apply targeted due diligence measures accordingly. This includes supplier vetting, annual policy reviews, training, and clear reporting mechanisms. This mapping enables us to focus our efforts where the risks of modern slavery are highest and to maintain transparency and accountability throughout our supply chain.



The following diagram illustrates Route 101’s Supply Chain structure:



Route 101 does not engage with any suppliers assessed as high risk for modern slavery. The assessment is made in relation to the jurisdiction in which the supplier is supplying, and the law which governs the agreement. Where the relevant law does not impose sufficient requirements to ensure adherence to the principles of this statement and/or UK Law or the refusal of suitable contractual terms being included. If any high-risk suppliers are identified they will be contractually required to adhere to terms equivalent to those imposed by UK law or have an appropriate Modern Day Slavery Policy Statement. This includes explicit prohibitions against forced, compulsory, or trafficked labour, and obligations to maintain transparency and compliance throughout their own supply chains. These requirements would be embedded as conditions within our supplier contracts and monitored through our due diligence and audit processes. This includes explicit prohibitions against forced, compulsory, or trafficked labour, and obligations to maintain transparency and compliance throughout their own supply chains. These requirements would be embedded as conditions within our supplier contracts and monitored through our due diligence and audit processes.

4. Ethical Purchasing Practices

Route 101 recognises that purchasing practices, such as unrealistic deadlines, last-minute changes, or aggressive cost-cutting, can inadvertently place pressure on suppliers and increase the risk of exploitative labour practices. While we do not currently engage with high-risk suppliers, we are committed to responsible procurement across our business. We assess our purchasing behaviours to ensure they support fair treatment of workers, including engaging in collaborative planning with suppliers, maintaining reasonable lead times, and avoiding practices that could incentivise forced or underpaid labour. We also maintain open dialogue with suppliers to identify and address any concerns related to labour conditions.

5. Procurement Process Integration

Route 101 integrates modern slavery risk assessment into each stage of its procurement process. This includes evaluating potential suppliers during pre-qualification, embedding anti-slavery clauses in contracts, and conducting ongoing monitoring throughout the process. This structure ensures that procurement decisions are made with consideration of ethical labour practices, working in collaboration with suppliers to identify and address any risks. This approach helps us maintain transparency and uphold our zero-tolerance stance on modern slavery throughout the lifecycle of our supplier relationships.

6. Supplier Risk Investigation

Route 101 is enhancing its approach to investigating suppliers' modern slavery risks through a structured and proactive framework. Suppliers are reviewed by risk level based on geography, industry, and workforce characteristics. Self-assessments are issued annually to gather insights into recruitment practices, subcontracting, and worker protections. Modern slavery checks are embedded into our supplier onboarding process, and we monitor supplier compliance via our supplier business reviews.

7. Worker Representation and Empowerment

Route 101 recognises the importance of worker representation in preventing modern slavery and promoting fair labour practices and we encourage our suppliers to support freedom of association, and access to independent grievance mechanisms. We promote open dialogue and transparency throughout our supply chain and are committed to working with suppliers who respect and uphold workers' rights to organise and be heard.

All Employees are currently based within the UK and all employees have background checks and rights of work checks carried out. Contractors also have background checks carried out to ensure rights to work. Any engagement of employees under the age of 18 is under the apprentice scheme or similar training programme

8. Preventing Debt Bondage

Route 101 recognises that debt bondage is a serious form of modern slavery, often linked to recruitment fees, wage withholding, or coercive repayment schemes. As part of our due diligence, we will work with suppliers to ensure that workers are not charged recruitment fees, are paid in full and on time, and are not subject to deductions that could lead to debt dependency. We will also review supplier practices around recruitment agents and labour brokers to ensure ethical hiring practices are upheld.

9. Collaboration with NGOS and Industry Partners

Route 101 recognises the value of collaboration in sharing best practices, improving transparency, and supporting collective action to address systemic risks in global supply chains. As such, Route 101 is committed to strengthening its efforts to prevent and mitigate modern slavery by engaging, where applicable, with non-governmental organisations (NGOs), peer organisations, and industry groups.

10. Compliance with this Statement

Staff must ensure that they read, understand, and comply with this policy. The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or with us.

Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. They must notify their line manager or a company director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. They are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If staff believe or suspect a breach of this policy has occurred or that it may occur, they must notify their line manager or a company director or report it in accordance with our Whistleblowing Policy as soon as possible.

With the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they must raise it with their line manager or a company director.

11. Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and our staff. Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. Supplier engagement and collaboration involves how we value suppliers and stakeholders whilst emphasising the need for and importance of working with suppliers and other stakeholders to promote awareness, transparency, and compliance with this policy.

Route 101 is an SME with no parent company, subsidiaries or affiliated entities. However, we have a number of large third-party vendor suppliers with whom we work regularly, and we fulfil our obligations under the slavery act by ensuring that they have robust Modern Slavery Statements that meet our required standards.

We aim to encourage openness and support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If staff believe that they have suffered any such treatment, they should inform their line manager immediately.

12. Breaches of this Statement

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may also terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels within Route 101, and that it is regularly reviewed by the directors to ensure its continuing suitability and relevance to the company's activities.

Our aim is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

13. Reporting Procedures and Enforcement

We will from time to time conduct due diligence exercises on our suppliers, contractors, and business partners. As part of this exercise, we check that their policies are updated at least annually and signed by a senior representative of their respective organisations.

Route 101 has clear procedures in place for responding to reports of suspected modern slavery. Staff are encouraged to report concerns through defined channels, including their line manager, a company



director, or via our Whistleblowing Policy. We ensure that individuals who raise concerns in good faith are protected from retaliation or detrimental treatment. All reports are investigated by an appointed director following a defined process, and appropriate actions are taken, including providing remedies to victims where applicable. These procedures reflect our commitment to transparency, accountability, and continuous improvement in tackling modern slavery

We communicate our efforts and progress in combating modern slavery through public statements, reports, and other relevant channels, including our website. We review our monitoring of others and the effectiveness of our policy, making any necessary improvements based on lessons learned and changes in the operating environment.

This Modern Day Slavery Policy Statement is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. It is communicated to all employees, external providers and other interested parties, and regularly reviewed in order to ensure its continuing suitability.

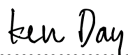
Signed:

Date:

Name:

Title:

DocuSigned by:



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02 July 2025 | 16:00 BST

Ken Day

Chief Operating Officer

Route 101 Limited