

Route 101 – Modern Slavery Policy Statement

1. Introduction

This statement sets out the steps Route 101 has taken to prevent, identify and mitigate the risks of modern slavery and human trafficking within its operations and supply chain.

This Statement is reviewed annually and may be reviewed earlier where significant changes occur to Route 101's operations, supply chain or risk profile, or where concerns relating to modern slavery or human trafficking are identified. To date there have been no instances of modern slavery or human trafficking concerns raised to us during the Financial Year 2024/2025 ended 31 August 2025, or any previous reporting periods.

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.

This Statement has been prepared in accordance with Section 54 of the Modern Slavery Act 2015.

2. Organisation Structure, Operations and Supply Chain

This statement covers the activities of Route 101 Limited. Route 101 is headquartered in the United Kingdom and conducts most of its operations within the UK. The company does not have any parent company, subsidiaries or affiliated entities. The company is a provider of next generation, SaaS customer engagement platforms, offering award winning solutions from market leading vendors. The business delivers a full range of services to ensure clients get the maximum value from the solutions provided, which includes all associated consultancy, professional services, training, and support.

All employees are employed within the UK and are subject to appropriate right-to-work verification processes. Route 101 may engage approved contractors and subcontractors in other jurisdictions where required to support customer delivery and business operations. Such contractors and subcontractors are subject to relevant background, compliance and contractual checks appropriate to their role and engagement.

Route 101's supply chain comprises technology and telecommunications providers, professional services organisations, recruitment agencies, independent consultants, facilities management providers and other business support suppliers. Relationships include both long-term contractual arrangements that support customer service delivery and lower-value purchases required for day-to-day business operations.

The majority of Route 101's expenditure relates to technology, cloud and telecommunications services that support the delivery of its customer engagement solutions. These suppliers are primarily located in the United Kingdom, United States, and other European jurisdictions. In addition, Route 101 procures recruitment, professional services, facilities management and other operational support services.

Route 101 recognises that certain categories of procurement, including contingent labour, facilities-related services, hardware supply chains and other labour-intensive services, may present a higher inherent risk of modern slavery and human trafficking and therefore require enhanced scrutiny.

Route 101 only engages suppliers where proportionate due diligence has been completed, relevant approvals have been obtained, and the supplier has been established in accordance with Route 101's procurement and governance

processes. Modern slavery considerations form part of Route 101's supplier onboarding, due diligence and supplier assurance activities.

To better understand and manage modern slavery risks within its supply chain, Route 101 undertakes a risk assessment of its suppliers. The assessment considers factors including industry type, workforce characteristics, commodity type, operating context, country risk and supply chain complexity. This enables Route 101 to focus its due diligence and monitoring activities on areas of higher risk and maintain transparency and accountability throughout its supply chain.

3. Governance, Roles and Responsibilities

Route 101 recognises that effective governance is fundamental to preventing modern slavery and promoting responsible business practices. Responsibility for Route 101's modern slavery policies is as follows:

- **Policies and governance:** the Chief Operating Officer, the Head of Legal & ESG, the Head of People Operations & Compliance and the ESG Consultant are responsible for the development, implementation, review and oversight of Route 101's Modern Slavery Statement, related policies and associated governance arrangements.
- **Risk assessments and due diligence:** the Legal & ESG Team is responsible for overseeing modern slavery and human rights risks within Route 101's supply chain, including modern slavery risk assessments, supplier due diligence and supplier assurance activities. The Compliance Team supports supplier onboarding, due diligence coordination and supplier governance processes.
- **Employment practices and training:** the Head of People Operations & Compliance is responsible for recruitment controls, employment policies, employee awareness activities and mandatory modern slavery training.
- **Investigations:** employment-related concerns are managed by the Head of People Operations & Compliance and, for supply chain matters, by the Legal & ESG Team and other relevant functions where appropriate.
- **Oversight and review:** the ESG Committee reviews modern slavery risks, due diligence activities, supplier assurance outcomes and improvement actions as part of Route 101's governance arrangements.

Route 101 encourages employees, suppliers and stakeholders to report any concerns relating to labour exploitation, unethical practices or modern slavery through established reporting channels.

4. Policies and Controls

Route 101 maintains a framework of policies, procedures and controls that support the prevention of modern slavery, human trafficking and unethical labour practices across its operations and supply chain. These arrangements are supported by Route 101's Sustainability Policy, which establishes the organisation's commitments relating to human rights, responsible and sustainable procurement, supply chain due diligence, equality, diversity and inclusion, and ethical business conduct.

Relevant policies and controls include:

- **Staff Handbook and Employment Policies:** set out Route 101's expectations regarding employee conduct, recruitment, equality, diversity and inclusion, dignity at work, bullying and harassment, disciplinary procedures, grievance management, training and development, employee welfare, and whistleblowing arrangements. The handbook promotes fair and ethical employment practices and provides mechanisms for employees to raise concerns about wrongdoing or unethical behaviour in confidence and without fear of retaliation.
- **Sustainability Policy:** establishes Route 101's overarching commitments and governance framework for environmental, social and ethical business practices. The policy includes commitments relating to human rights, modern slavery prevention, responsible and sustainable procurement, supply chain due diligence and continuous improvement across Route 101's operations and supply chain.

- **Supplier Code of Conduct:** sets out Route 101's expectations regarding legal compliance, ethical business conduct, labour and human rights, health and safety, diversity and inclusion, environmental responsibility and responsible supply chain management. The Code prohibits forced, bonded and child labour, requires fair treatment of workers, compliance with labour laws, respect for freedom of association, and appropriate due diligence to identify and address modern slavery and human rights risks within supply chains.
- **Sustainable Sourcing Policy:** incorporates environmental, social and ethical considerations into supplier selection, onboarding and supplier management activities. The policy requires suppliers to comply with labour, health and safety and human rights legislation, align with Route 101's Supplier Code of Conduct, undertake appropriate due diligence where risks exist, and support responsible business practices throughout the supply chain.
- **Procurement Policy:** establishes Route 101's supplier onboarding, risk assessment, due diligence, approval and governance processes. The policy supports the identification, assessment and escalation of supplier risks and ensures that supplier engagements are subject to appropriate review and oversight.

All employees are required to acknowledge Route 101's Staff Handbook and associated employment policies during the onboarding process. Route 101 expects suppliers, contractors and business partners to operate in accordance with applicable legislation and recognised ethical standards. Supplier agreements may include contractual provisions requiring compliance with relevant employment, labour and human rights legislation and prohibiting forced, bonded, compulsory, trafficked and child labour.

In line with Route 101's Supplier Code of Conduct, suppliers are expected to promote equivalent standards throughout their own operations and supply chains, including fair treatment of workers, compliance with labour laws and respect for human rights. The Supplier Code of Conduct aligns with internationally recognised standards including the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (ILO), OECD Due Diligence Guidance for Responsible Business Conduct, the Ten Principles of the UN Global Compact (UNGC) and the UN Guiding Principles on Business and Human Rights (UNGPs).

5. Due diligence and Supplier Assurance

Route 101 integrates modern slavery risk assessment into each stage of its procurement process. This includes evaluating potential suppliers during pre-qualification, incorporating appropriate contractual requirements and undertaking ongoing supplier monitoring. Modern slavery due diligence is conducted by the Legal & ESG Team, which is responsible for overseeing modern slavery and human rights risks within Route 101's supply chain.

Due diligence activities may include:

- Supplier onboarding reviews.
- Assessment of modern slavery and human rights risks.
- Review of supplier policies and governance arrangements.
- Review of supplier modern slavery statements where applicable.
- Supplier business reviews and relationship management activities.
- Ongoing monitoring of material suppliers and subcontractors.

Route 101 has completed its first organisation-wide modern slavery risk assessment across its supplier base to support a more structured and risk-based approach to supplier due diligence and monitoring. Approximately 80% of active suppliers were assessed as low risk and 20% as medium risk. The assessment considered a range of factors including industry sector, workforce characteristics, commodity type, operating context, country risk, supply chain complexity, modern slavery statements, human rights policies and publicly available disclosures when determining the final residual risk rating.

Suppliers operating in sectors or supply chains commonly associated with elevated modern slavery risks were subject to additional review, including assessment of modern slavery statements, governance arrangements and supplier controls. Following completion of due diligence and risk review, no suppliers were classified as High residual modern slavery risk.

The assessment will be reviewed annually and updated as necessary to reflect changes in Route 101's supplier base, procurement activity and emerging modern slavery risks. New suppliers are assessed as part of the supplier onboarding process, while existing suppliers are reviewed at least annually, at contract renewal, or where concerns arise. Tier 1 and Tier 2 suppliers may be subject to more frequent review, proportionate to their risk profile and the nature of the services provided.

Route 101 maintains reporting and escalation mechanisms through its policies, procedures and whistleblowing arrangements. Employees, contractors and other stakeholders are encouraged to raise concerns relating to labour exploitation, human trafficking, human rights violations or other unethical conduct. Concerns raised in good faith are investigated appropriately and individuals raising concerns are protected from retaliation.

If concerns are identified, Route 101 will investigate the matter, engage with the supplier where appropriate and implement proportionate corrective actions. Where material breaches are identified and cannot be adequately addressed, Route 101 reserves the right to suspend or terminate supplier relationships in accordance with contractual arrangements.

6. Assessing and Managing Modern Slavery Risk

Route 101 assesses modern slavery risks within its operations and supply chain using a risk-based approach. Risks are considered as part of supplier onboarding, supplier assurance and ongoing supplier management activities, taking into account factors such as industry sector, workforce characteristics, supplier location, commodity type and supply chain complexity. Based on the information available during the reporting period, Route 101 did not identify any suppliers assessed as High residual modern slavery risk.

Modern slavery risks are managed through supplier due diligence, contractual controls, implementation of the Supplier Code of Conduct, responsible sourcing practices, employee training and established reporting and escalation processes. Where suppliers are assessed as presenting elevated modern slavery risks, Route 101 may apply enhanced due diligence and contractual requirements to support compliance with modern slavery and human rights expectations. Route 101 reviews identified risks through its governance arrangements and implements corrective actions where necessary to support the prevention of modern slavery and human trafficking throughout its operations and supply chain.

During the reporting period, Route 101 did not identify any instances of modern slavery within its operations or supply chain and no modern slavery concerns were raised through its reporting mechanisms.

7. Training, Awareness and Reporting

The prevention, detection and reporting of modern slavery is the responsibility of everyone working for or on behalf of Route 101. All employees receive modern slavery awareness training as part of their employment with Route 101. Training is designed to help employees understand the risks of modern slavery, recognise potential indicators of labour exploitation and human trafficking, and understand how concerns should be reported and escalated.

Route 101's zero-tolerance approach to modern slavery is communicated to suppliers, contractors and business partners through supplier onboarding, contractual arrangements and the Supplier Code of Conduct.

Employees, contractors, suppliers and other stakeholders are encouraged to report concerns relating to labour exploitation, human trafficking or modern slavery at the earliest opportunity. Concerns raised in good faith will be treated seriously and investigated appropriately. Route 101 is committed to protecting individuals who raise concerns from retaliation or detrimental treatment.



8. Monitoring and Evaluation

Route 101 monitors modern slavery risks through its supplier due diligence, supplier assurance and ESG governance processes. During the reporting period, no concerns relating to modern slavery were raised through Route 101's reporting mechanisms. To assess the effectiveness of its approach, Route 101 monitors the completion of supplier due diligence activities, supplier compliance with Route 101's Supplier Code of Conduct and modern slavery requirements, completion of employee modern slavery awareness training, concerns raised through reporting channels, and the implementation of corrective actions where required.

During the next reporting period, Route 101 will continue to develop its supplier modern slavery screening process, communicate its Supplier Code of Conduct across the supplier base, undertake risk-based reassessments where appropriate, and maintain annual reviews of active suppliers. Progress will be monitored through Route 101's ESG governance processes and used to support continuous improvement.

9 Approval and Review

This Modern Slavery and Human Trafficking Statement has been approved by Ken Day, Chief Operating Officer.

The Statement is reviewed annually to ensure ongoing effectiveness, legal compliance and alignment with organisational objectives.

Signed by:


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Signed:

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Date:

16/07/2026

Name:

Ken Day

Title:

Chief Operating Officer

Route 101 Limited



Document Control

Date	Version	Created By	Description of Change
02/02/2018	1.0	Trevor Saadi	Initial version
02/02/2019	1.1	Trevor Saadi	Minor updates
02/02/2020	1.2	Ken Day	Minor updates
01/09/2020	2.0	Ken Day	Company name update
01/09/2021	2.1	Ken Day	Review and minor updates
01/09/2022	2.2	Ken Day	Review and minor updates
01/09/2023	3.0	Ken Day	New version
16/02/2024	4.0	Sarah-Jane Singh	Branding update
17/02/2025	5.0	Sarah-Jane Singh	Annual Review
25/06/2025	5.1	Sarah-Jane Singh	Major update
03/07/2026	6.0	Alba Fuentes Delpon	Major update