Modern Slavery Statement 2026

Introduction

This statement outlines Positive Change Group's commitment to combatting modern slavery, forced labour, and human trafficking within our operations and supply chains. We recognise our responsibility to address these issues and strive to uphold ethical standards and human rights across our business.

Modern slavery remains a significant global challenge, affecting millions of people worldwide. As a responsible business, Positive Change Group is committed to combatting this issue. Our modern slavery statement fosters transparency by outlining how we identify and address these risks in our supply chains. Upholding human rights and ethical conduct aligns with our core values and builds trust with clients, employees, and partners who share our commitment to a more sustainable and responsible future.

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Our Vision

Human Rights

Positive Change Group is committed to respecting human rights and labour standards. We adhere to the International Labour Organisation's core conventions and support the UN Guiding Principles on Business and Human Rights.

This means we:

- Respect the rights and dignity of all individuals, regardless of their background, including indigenous people, women, minorities, children, LGBTQ+ individuals, people with disabilities, and migrant workers.
- Avoid involvement in human rights abuses, as stated in the UN Guiding Principles on Business and Human Rights (UNGPs) and emphasised in the human rights chapter of the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.
- Support the freedom of association and collective bargaining by recognising the right of our employees to form unions and negotiate their working conditions.
- Strive for fair treatment of employees, contractors and suppliers by providing fair wages, benefits and working conditions.
- Support the elimination of all forms of forced or compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment and occupation by ensuring all our employees are treated fairly and have safe working conditions.

Modern Slavery: Our Zero-Tolerance Approach

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced labour and human trafficking. All have in common the deprivation of a person's liberty by another in order to exploit them. As stated above, Positive Change Group has a zero-tolerance approach to modern slavery and forced labour. We are committed to acting ethically and with integrity in all our business dealings and relationships. We strive to ensure modern slavery and forced labour does not take place anywhere in our own business or in any of our supply chains.

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Positive Change Group: Committed to a Responsible and Sustainable Supply Chain

Positive Change Group is committed to building a responsible and sustainable supply chain, free from modern slavery. We recognise this journey requires ongoing vigilance. Our modern slavery statement serves as a critical first step, outlining how we are actively identifying and mitigating potential risks within our supply chain. Through transparency and collaboration with our partners, we strive to ensure that all our suppliers align with our commitment to ethical sourcing and social responsibility. This journey towards a sustainable future requires continuous improvement, and we believe transparency is key to building trust with stakeholders who share our values.

Our Commitment Extends to All

This policy applies to all people 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.

Governance and Oversight

Our commitment to combatting modern slavery is overseen by our board of directors and senior management team.

- Group Chief Executive Officer: Oversees the sustainability and corporate responsibility strategy across Positive Change Group.
- Chief Financial Officer: Oversees supplier performance and onboarding, including screening processes.
- Risk Committee: Develops and maintains the risk register, identifying vulnerabilities and working with the CFO to prioritise and address them.

Assessing and Managing Risk

To identify potential modern slavery risks, we conduct an assessment of our main suppliers every year. Our focus is on identifying and addressing potential vulnerabilities.

Given the nature of our business, our supply chain and the review processes undertaken, we believe that the risk of modern slavery in our supply chain is currently low.

While the majority of our suppliers operate in low-risk environments, we maintain ongoing vigilance through regular supplier evaluations. No instances of modern slavery have been identified to date. We are committed to continuous improvement and ensuring that both existing and new suppliers adhere to our ethical standards.

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Our Supply Chain

Given our business model, we assess the risk of modern slavery within our supply chain as low. Our supplier base is limited and primarily comprises UK, EU and overseas service providers.

The majority of our suppliers (over 50%) are small and medium-sized enterprises (SMEs) based in the UK or EU. Of our supplier base, 43% meet the turnover threshold requiring publication of a modern slavery statement under the Modern Slavery Act 2015, and each of these suppliers either publishes its own statement or is covered by a statement published on behalf of its parent company. Over 90% of our suppliers are based either in the UK or EEA, less than 5% are in the USA.

Our providers include contractors, physical business services, professional services, IT and utilities:

- Contractors / freelancers – This category encompasses individuals providing specific services on a project or contract basis.
- IT services & Print – This category covers technology providers supplying hardware, software, and IT support, as well as print-related services.
- Professional services – This category comprises external experts providing specialised services such as legal, financial, and recruiting advice.
- Physical business services – This category includes suppliers providing essential services for the day-to-day operation of our physical workplaces. These services encompass cleaning, security, and office supplies.
- Utilities – This category includes essential services such as electricity, gas, water, and waste management.

Policies

We communicate our commitment to ethical conduct and human rights through our policies, including:

- Code of Ethics: Outlines our values and expectations for suppliers, clients, and employees.
- Sustainable Procurement Policy: Guides supplier selection to minimise environmental impact, prioritise human rights, and promote ethical sourcing across our supply chain.
- Supplier Code of Conduct: Sets standards for suppliers, subcontractors and partners to minimise adverse impacts on people and the planet.
- Anti-Bribery and Corruption Policy: Defines ethical business practices.
- Whistleblower Policy: Provides a mechanism for reporting concerns about behaviours in the workplace and supply chain.
- Anti-Bullying and Harassment Policy: Promotes a respectful and inclusive workplace.
- Diversity and Inclusion Policy: Fosters a culture of equality and belonging in the workplace.

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Engaging Our Employees

We promote awareness and understanding of our supply chain policies among our employees through training, communication, and ongoing education initiatives.

Positive Change Group makes these policies readily accessible to all employees, and they are communicated as part of the induction process. Training will be provided as required to ensure all relevant members of staff have a clear understanding of the risks of modern slavery and human trafficking in their respective business.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Looking Forward

We are committed to ongoing improvement in our supply chain transparency and ethical practices. Future initiatives will focus on expanding our supplier assessment criteria and strengthening supplier relationships. We aim to contribute to a more ethical and sustainable global supply chain.

This statement has been approved by the Positive Change Group Board of Directors and will be reviewed and updated annually.

David Christopherson

Group Chairman

Positive Change Group

October 2026

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