Modern Slavery Act – Annual Statement

The Modern Slavery Act came into force on 29th October 2015 and places an obligation on QTS to publish an annual statement on the activities that QTS perform to eliminate modern slavery in our business and supply chains. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the activities undertaken by QTS in respect of the prevention of modern slavery and human trafficking and constitutes the company's annual statement for the financial period 1st October 2025 to 30th September 2026.

QTS Group provides specialist construction, engineering and vegetation control services in support of the creation and maintenance of assets for both public and private infrastructure sector customers. Work is conducted within the United Kingdom by a directly employed and contracted workforce. QTS carries out right-to-work checks for its directly employed workers in accordance with applicable requirements and sets appropriate compliance expectations for contractors. QTS Group is part of the Renew Group. This statement covers QTS Group, REL and QTS Training.

Modern Slavery is a criminal offence, it can occur in various forms, including servitude, forced or compulsory labour and human trafficking. All of these deprive a person of their liberty by exploiting them for personal or commercial gain.

QTS does not tolerate modern slavery or human trafficking in its operations or supply chains. We are committed to acting ethically and with integrity, identifying and addressing risks, and responding appropriately to any concerns raised.

We assess modern slavery risks as part of supplier approval and ongoing monitoring. Where concerns are identified, we consider the safety and circumstances of affected workers, investigate the matter, and determine appropriate action. This may include requiring corrective action, seeking specialist advice, reporting concerns to the relevant authorities, suspending new work or ending the supplier relationship. We do not treat immediate removal from the approved suppliers list as an automatic response where it could increase harm to affected workers.

Our supplier due diligence considers modern slavery risks associated with the goods or services supplied, the nature of the work, the use of subcontracted or temporary labour, and relevant sourcing locations. Depending on the assessed risk, checks may include supplier questionnaires, review of policies and employment documentation, requests for independent assurance, or audits. Findings are recorded and escalated for corrective action where required.

Where an audit is appropriate, its scope may include site visits, document reviews and worker interviews to consider working contracts, wages, working hours and employment conditions. The nature and frequency of checks should reflect the assessed risk.

Depending on their scope, audits may assess:

- Compliance with local and national laws
- Legal working contracts and wage documentation
- Absence of child labour (no workers under 16)
- Timely payment of wages
- No withholding of passports or identity documents
- No physical or verbal abuse
- Appropriate HR policies and grievance mechanisms

- Fair treatment of temporary workers

We regularly map our supply chain to identify and assess risks, especially in regions or sectors with higher vulnerability to modern slavery. This mapping is updated annually and whenever significant changes occur in supplier status or sourcing locations.

For suppliers assessed as higher risk, we may request independent assurance or audit evidence and review the findings to inform proportionate follow-up action.

Audit findings inform corrective actions, supplier engagement and process improvements. Where a supplier does not meet our standards, we assess the circumstances and the potential impact on affected workers before deciding whether to require remediation, suspend work or end the relationship. We engage with industry bodies to stay current on best practices and evolving risks.

Significant audit findings are considered for escalation to senior management and corrective action where appropriate. Our 2025/26 audit programme did not identify indicators of modern slavery in the suppliers and activities covered by the checks undertaken. This finding is limited to the scope of those checks and does not rule out risks elsewhere in our supply chain.

QTS pays its employees, including apprentices, at least the National Minimum Wage or National Living Wage rate applicable to them for the relevant pay period. We expect suppliers to comply with applicable wage legislation and consider wage practices as part of our supplier due diligence.

QTS carries out pre-employment checks, including right-to-work checks where required, for its directly employed workers. Right-to-work checks establish a person's eligibility to work; they do not, by themselves, establish that the person is free from coercion or exploitation. Modern slavery awareness training and the reporting of concerns are separate parts of our approach. Staff involved in engaging or inducting workers and managing the supply chain receive additional training where appropriate.

To ensure QTS is compliant with the act we carry out due diligence within the organisation and within our supply chain. We have an internal compliance department that carry out and continually monitor routine checks and audits to ensure that our processes are effective and in full compliance with the act.

QTS business activities during 2025/26 included:

- Continued review of processes and procedures to ensure that modern slavery and human trafficking is not taking place within the supply chain.
- Introduction of an Ethical Procurement Policy
- Initiatives including employee Modern Slavery awareness training, improved supplier reviews and assessment and improved audit processes.
- Incorporation of Modern Slavery requirements into new and existing supplier review processes.
- Key personnel undertaking the CIPS Ethics Course which provides vital up to date information on modern slavery and areas of concern and risk.
- No indicators of modern slavery were identified in the suppliers and activities covered by our 2025/26 audit programme. This finding is limited to the scope of the checks undertaken and does not rule out risks elsewhere in the supply chain.

QTS business objectives for the financial year 2026/27 include:

- Continuing to monitor suppliers using a range of initiatives across our business including the monitoring of suppliers to cover both high and medium risk suppliers and looking at the supply chain to evidence their commitment to the prevention of Modern Slavery.
- Undertaking further supply chain reviews to ensure that any potential new or existing suppliers have not changed their status in terms of “risk”.
- Continuing to engage with key strategic suppliers and industry bodies across the markets in which they operate to better understand capability, best practice and learning on Modern Slavery to continuously improve our approach to Modern Slavery.
- Use the approved supplier process to raise awareness across our supply chain of the signs of modern slavery and how to prevent it.

QTS Group is committed to fostering a culture of transparency and integrity, where all employees, suppliers, and stakeholders feel empowered to report concerns about modern slavery, human trafficking, or unethical practices without fear of reprisal.

Reporting Channels:

Concerns or suspicions regarding modern slavery can be reported confidentially to our Compliance Department at compliance@qtsgroup.com, via email at jamielewis@qtsgroup.com or by calling the UK Modern Slavery & Exploitation Helpline 0800 0121 700.

Reports may also be made through the government’s online portal at https://www.modernslavery.gov.uk/start

This statement will be subject to annual review and has been approved by the QTS Group Ltd board.

This statement has been endorsed by the QTS Group’s Managing Director, Andrew Steel, on the 9th November 2026 and is reviewed and developed on an annual basis.

A signed copy is retained at Head Office.