

# Modern Slavery and Human Trafficking Statement for the Financial Year 2024

## Introduction

This statement is made on behalf of Apogee Corporation Limited pursuant to section 54(1) of the Modern Slavery Act 2015 and comprises our slavery and human trafficking statement. It outlines the comprehensive steps we have taken as a business to identify and prevent slavery and human trafficking in our own operations and supply chains. We understand our profound responsibilities and are committed to continually improving our practices to combat modern slavery and human trafficking as an integral part of our broader Environmental, Social, and Governance (ESG) strategy.

## Our Business and Supply Chains

Apogee Corporation Limited is Europe's largest multi-brand provider of managed print services, document and process technology and outsource services, supplying equipment and services to customers in the UK, Republic of Ireland, Isle of Man, Jersey, Guernsey and Germany. The Company has its head office in Maidstone in the UK, with operational offices across the UK, Republic of Ireland, Jersey and Germany. Apogee Corporation Limited sources its products and services mainly from UK suppliers, and occasionally from other countries in Europe. Our supply chain includes the sourcing of print and IT hardware, software solutions, consumables and service-related items that are principally related to print and IT technologies.

## Our Policies on Slavery and Human Trafficking

We are unwavering in our commitment to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our **Modern Slavery Policy** reflects this commitment to acting ethically, with integrity in all our business partnerships and relationships, implementing and enforcing effective systems and controls to ensure slavery and human trafficking does not take place anywhere in our business and in our supply chains. It is a cornerstone of our wider commitment to human rights and ethical conduct, as reflected in our **Supplier Code of Conduct**.

Accompanying this, our **Whistleblowing Policy** provides a clear system for our employees to confidentially escalate concerns, including modern slavery and human trafficking issues or breaches of our group policies. Our broader commitment to fair labour practices and ethical conduct is also embedded within our **Diversity, Equality & Inclusion Policy** and our comprehensive **Integrated Management System (IMS)**, which includes robust Human Resources and Occupational Health & Safety management frameworks (ISO 45001).

Both the Modern Slavery Policy and Whistleblowing Policy are reviewed annually. There have been no breaches or suspected breaches of our Modern Slavery Policy reported in 2024.

## Due Diligence Processes for Slavery and Human Trafficking

As part of our robust initiative to identify, monitor, and mitigate against human rights risks within our operations and supply chains, Apogee has implemented a **risk-based approach to supplier due diligence**. We have established a **Procurement Governance Function** to define strategy and standards, acknowledging that procurement activities are conducted across various operational departments. Our due diligence is a collaborative effort, leveraging the expertise of key functions:

- The **Compliance Team** (led by the Head of Commercial Compliance) provides essential education on legal and regulatory requirements. They lead and support departments in conducting supplier onboarding and assessment against Apogee's **Supplier Onboarding and Third-Party Due Diligence Policy & Procedure**, which includes specific checks for **identified ESG factors**, as well as AML, PEPs, and Sanctions.
- The **Legal Team** provides legal counsel and reviews contractual terms related to ethical sourcing.
- The **QHSE Manager (Head of Sustainability and Business Assurance)** assesses risks related to environmental, health & safety, and social aspects within the supply chain, including modern slavery indicators.
- **Operational Procurement Teams** (e.g. Marketing & Events, Logistics & Warehouse, ODS, Product, Facilities, People & Culture Teams) are responsible for ensuring that all new and existing suppliers undergo the required due diligence for their specific procured goods and services, as guided by the Procurement Governance Function.

We utilise our **Procurement SharePoint** system as the central repository for storing supplier information, documentation, risk assessments, and compliance records, ensuring visibility and traceability.

Our due diligence processes are designed to:

- Identify inappropriate employment practices.
- Identify, assess, and monitor other potential risk areas, including those related to specific industries, business transactions, and countries of operation.
- Mitigate the risk of modern slavery and human trafficking occurring.
- Protect whistle-blowers through our Whistleblowing Policy; and
- Investigate reports of modern slavery or human trafficking diligently and with appropriate action.

Regular reporting on supply chain compliance, including modern slavery risk, is performed throughout the business and reviewed by the **ESG Group**, ensuring top-level oversight.

## Supplier Adherence to Our Values and Ethics

We have **zero tolerance** for modern slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethical standards, we operate in line with principles of responsible sourcing. This includes expecting suppliers to adhere to prevailing minimum wage applicable within their relevant country of operations and to uphold fair working conditions, human rights, and labour practices.

We have developed a comprehensive **Supplier Code of Conduct** which explicitly outlines our expectations, including the prohibition of modern slavery, forced labour, and child labour. The Supplier

Code of Conduct lists Apogee Corporation Limited's Mandatory Policies and we expect all suppliers to adhere to these standards or higher.

The **Procurement Governance Function**, in collaboration with the **relevant operational procurement teams (e.g. Marketing, Logistics, ODS, Product, Facilities, People & Culture Teams)**, will monitor and enforce compliance with the Supplier Code of Conduct, addressing any non-conformance proactively.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chains, we provide relevant in-house awareness training to our employees. This training is targeted, where necessary, to **procurement-active teams, Human Resources, and relevant managers**, to equip them with the knowledge to identify and respond to risks.

Under our Supplier Code of Conduct, we require all business partners and suppliers to provide regular and relevant training to their employees and sub-suppliers on modern slavery risks and ethical labour practices.

## Next Steps

Apogee is committed to continuous improvement in its efforts to combat modern slavery. Our next steps for the Financial Year 2024/25 will focus on embedding our enhanced policies and working diligently with our existing supply chain for reassessment against our new standards and Supplier Code of Conduct.

To measure our progress in this critical area, we commit to the following Key Performance Indicators (KPIs) for the Financial Year 2024/25:

- **Supplier Due Diligence & Reassessment:** Achieve due diligence reviews for 90% of identified High-Risk Suppliers, assessed against our Procurement Policy, Supplier Onboarding and Third-Party Due Diligence Policy & Procedure, and Modern Slavery Policy. This target reflects our commitment to thoroughly reassess our existing high-risk relationships.
- **Employee Training & Awareness:** All employees are required to complete a mandatory annual training module on modern slavery and human trafficking as part of the Apogee Integrity training program. This module is designed to provide employees with the necessary knowledge to identify, report, and prevent all forms of modern slavery, in line with our company's zero-tolerance policy. In addition, all employees are required to review and accept the company's Modern Slavery and Human Trafficking Policy annually.
- **Supply Chain Engagement & Communication:** Communicate our Supplier Code of Conduct to our entire supply chain, requiring them to either formally confirm agreement or provide evidence of alignment to the same or higher ethical standards as Apogee, thereby embedding our standards externally.

Beyond these measurable targets, we will also:

- Continue to raise awareness of the Anti-Slavery and Human Trafficking Policy and Supplier Code of Conduct with our employees and suppliers through our Procurement SharePoint Supplier Onboarding Platform and other communication channels.
- Provide additional targeted training for all relevant procurement-active teams and managers (including Procurement Governance Function, Marketing, Logistics, ODS, Product, Facilities, People & Culture Teams) as necessary, building on identified risk areas.
- Integrate any learnings from due diligence, monitoring, and industry best practices into our future procurement strategy and broader ESG objectives.

## Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the financial year ending 31st October 2024. This statement was approved by the Board of Directors of Apogee Corporation Limited on 31<sup>st</sup> July 2025 and signed by the Chief Executive Officer on their behalf.

**This Modern Slavery and Human trafficking statement for financial year 2024 has been approved & authorised by:**

**Name:** James Clark

**Position:** Chief Executive Officer

**Date:** Dec 18, 2025

**Signature:** James Clark

James Clark (Dec 18, 2025 17:33:41 GMT)