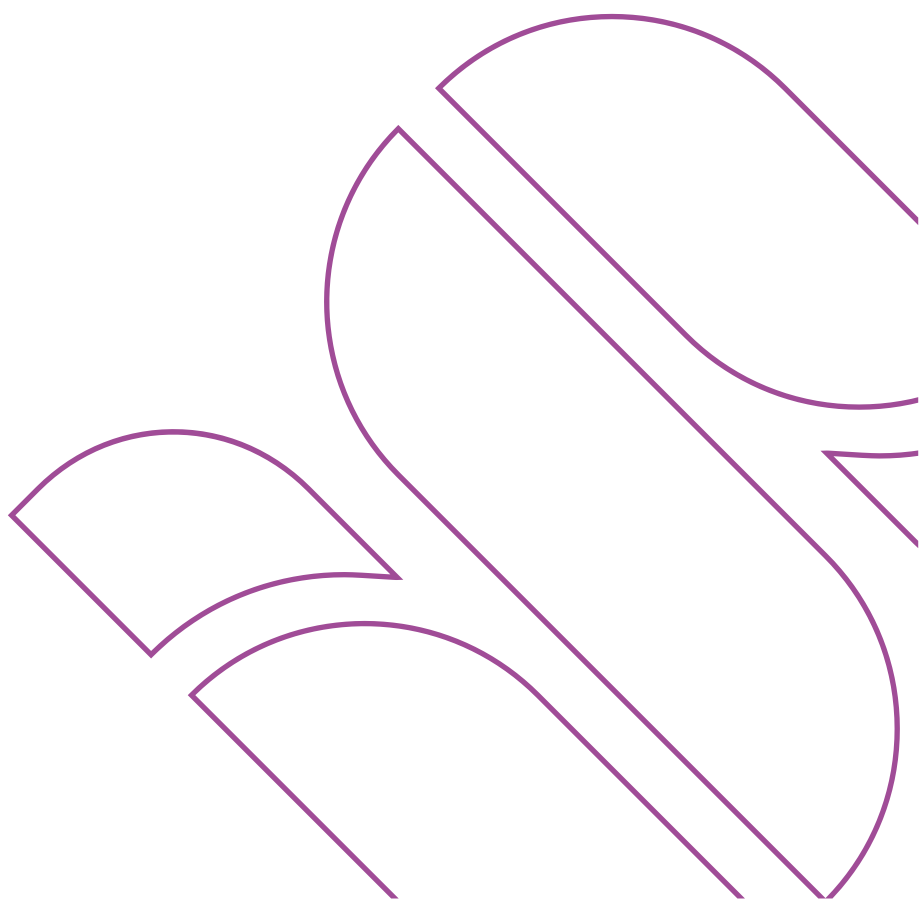




Sureserve

Modern Slavery Statement 2026



Our commitment to preventing modern slavery

At Sureserve we are committed to conducting our relationships to the highest ethical and moral standards and acting with integrity and professionalism in all our activities. This is in line with our values and the expectations of our colleagues, customers and other stakeholders. It includes the prevention of modern slavery, child labour and human trafficking in all its forms and extends to all business dealings and transactions in which we are involved, regardless of location or sector.

Scope and coverage of this statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “Act”) and sets out the steps taken by Sureserve Group Limited (“Sureserve”) and relevant subsidiaries (“Sureserve Group” or “Group”) during the financial year ending 30 September 2025 (“FY 2025”) to prevent modern slavery and human trafficking in our business and supply chains.

Under the Act, a legal obligation to publish a statement applies to organisations that carry out business in the UK and which have a total annual turnover in excess of £36m. This statement has therefore been approved and adopted by the Board of Sureserve, as well as each of the Group’s subsidiaries that meets this requirement under the Act (as set out in the Appendix). This statement also extends to our businesses which are not legally required to make a statement under the Act, regardless of their location, size or turnover. This statement covers all permanent and temporary employees as well as subcontractors of all Sureserve Group companies.

Organisation and Structure

Sureserve provides trusted high-quality solutions that focus on energy efficiency to create warm, safe and compliant homes and buildings. We work nationwide in the United Kingdom for housing associations, the public sector and private organisations. Sureserve Group’s head office is in London. The Group businesses operate from offices located across England, Scotland and Wales. For more information on our business structure, please see our website at www.sureserve.co.uk.

Policies in relation to slavery and human trafficking

Sureserve has a zero-tolerance approach to modern slavery and is 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. This commitment is made in line with the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights and the Children’s Rights and Business Principles. Our Group-wide Code of Conduct sets out our commitment to the prevention of modern slavery in our business and supply chains and applies to all employees, suppliers and other stakeholders.

We also have a Whistleblowing Policy to encourage and protect those who come



forward, supported by a reporting hotline (ssg.whistleblower@sureserve.co.uk), which is confidential and available to all employees, suppliers and other stakeholders. There were no reports relating to modern slavery or human trafficking to the hotline during FY 2025.

Our Supplier Code of Conduct sets out our commitment to the prevention of modern slavery in our supply chain and prohibits the use in our supply chain of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

Risk management and due diligence

We assess, monitor and mitigate risks relating to slavery and human trafficking on a Group-wide basis, with individual divisions and operating companies taking specific actions where appropriate to the level of risk.

Supply chain

The Sureserve Group supply chain is made up of material and plant suppliers and trade subcontractors. There are approximately 2,500 different organisations in our supply chain. We have a Supplier Code of Conduct and supplier due diligence processes in place to help identify and address potential risks of modern slavery. Suppliers are expected to ensure that:

- Modern slavery is not present in their company
- Safe, fair and ethical working conditions are provided
- The risks within their own supply chain are understood
- Zero tolerance, responsible management and compliance with all legal requirements is reflected in their policies, procedures, practices and in contracts with their own suppliers

The Sureserve Group conducts reviews with key suppliers and reserves the right under the Supplier Code of Conduct to seek annual certificates of compliance. A risk-based approach is taken to identify suppliers we consider to be at greatest risk including those that operate by employing casual or temporary labour, those that operate outside of the UK and EU, and manufacturers that source material outside the EU.

If cases, or allegations, of forced labour were identified within our supply chain, we would investigate any concern thoroughly, Sureserve Group would notify the appropriate authorities and work with the supplier to understand the situation. A set of corrective actions would be agreed to address the issues, and the supplier would be required to implement these. If a supplier failed to deliver the improvements Sureserve Group would terminate the contract. There have been no such cases or allegations in FY 2025.

Our standard contracting terms continue to incorporate specific obligations on our suppliers to comply with applicable anti-slavery and human trafficking laws, including the Act. Our standard contracting terms also reference our Supplier Code of Conduct which reiterates these principles. The principles include the rights to free and fair employment, freedom of association, right to collective bargaining, right to safe and hygienic working conditions, prevention of the use of child labour, anti-discrimination procedures in place and considerations around zero-hours contracts, reasonable working hours and living wages.

Employee protection

At Sureserve, we want to attract and retain the right people, with the right skills and behaviour by offering an inclusive and welcoming environment, which includes a competitive pay with market leading benefits. Most of our businesses, are aligned to pay the Real Living Wage. Where this is not yet possible, employees are paid the National Minimum Wage, and we are actively review all these arrangements.

Employee training and awareness

Raising colleagues' awareness of trafficking and modern slavery is key to identifying and helping to prevent modern slavery and human trafficking. All employees are required adhere to Sureserve's Code of Conduct and other policies and procedures that include provisions for preventing modern slavery.

Mandatory training is provided on an annual basis for all employees covering the Code of Conduct and the Groups broader sustainability and social practices. New staff are given an induction during their first week that includes additional onboarding sessions.

All employees have access to a Document Library which includes all our policies and procedures, including for Modern Slavery. Our Employee Handbook, which is available to everyone across the Group, reinforces these messages by setting out our expectations for employees.

Board approval

The Sureserve Group Limited Board recognises the importance of the provisions of the Modern Slavery Act 2015 and the Directors aim to ensure that slavery and human trafficking have no part in the Group's operations and supply chain. The Group has always been vigilant about the welfare of our colleagues, customers, suppliers and other stakeholders and aims to be transparent in its practices. The Board welcomes the opportunity to state its firm commitment to a zero-tolerance approach to modern slavery and human trafficking.

This statement has been approved by the Board of Directors of Sureserve Group Limited for the financial year ended 30 September 2025. This statement has also been approved by the Boards of Directors of relevant UK subsidiaries, as set out in the Appendix.

Approved by:



Graham Levinsohn
Chair and Group CEO – Sureserve
28th November 2025

Appendix

This statement applies to all entities within the Sureserve Group, a full list of which are available in our Annual Report and Accounts.

CLP Group FS Ltd.†
Hillside MS Ltd.†
Infinitas Design Ltd.†
Purdy Contracts Ltd.*†
R. Dunham (UK) Ltd.†
Spokemead Maintenance Ltd.†
Sureserve Compliance Central Ltd.*
Sureserve Compliance Fire Ltd.*
Sureserve Compliance Holdings Ltd.*
Sureserve Compliance North Ltd.*
Sureserve Compliance Northwest Ltd.*
Sureserve Compliance South Ltd.*
Sureserve Compliance Water Ltd.
Sureserve Energy Holdings Ltd.*
Sureserve Energy Services Meters Ltd.*
Sureserve Energy Services North Ltd.
Sureserve Energy Services Public Buildings Ltd.
Sureserve Energy Services South-West Ltd.†
Sureserve Energy Services UK Ltd.*
Sureserve Energy Services Wales Ltd.†
Sureserve Group Ltd.*
Sureserve Holdings Ltd.*
Swale Heating Ltd.

*These entities meet the turnover threshold under section 54 of the Modern Slavery Act 2015.

†These entities were acquired by Sureserve during the course of FY 2025 – this statement only applies to the period for which they were under Sureserve ownership. They have published their own statements for the preceding period.

