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SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR YEAR END 31 MARCH 2025

RIGBY GROUP (RG) PLC

SEPTEMBER 2025

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SLAVERY AND HUMAN TRAFFICKING STATEMENT

1.0 INTRODUCTION

This statement has been published in accordance with the requirements of section 54(1) Modern Slavery Act 2015 “the Act”. It sets out the steps taken by Rigby Group (RG) PLC “Rigby Group” during the financial year ended 31 March 2025 to ensure modern slavery and human trafficking, collectively referred to as “modern slavery” in this statement, is not taking place in our business or our supply chains. We adopt a zero-tolerance approach to modern slavery.

2.0 ORGANISATION STRUCTURE AND SUPPLY CHAINS

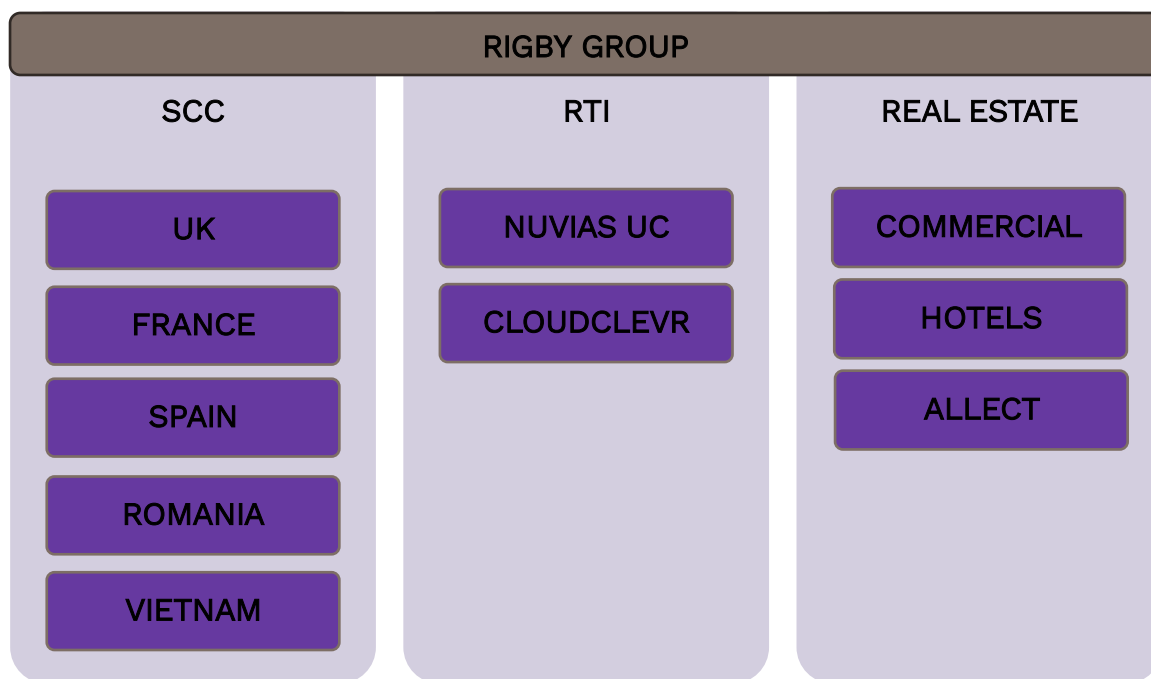
2.1 BUSINESS STRUCTURE

Rigby Group is a private, family-owned business and is the ultimate parent company of a diverse range of businesses with technology at its core. The shareholders are directors of the Rigby Group as well as its divisional boards and several of its operating businesses. These are viewed under the three strategic pillars of SCC, Rigby Technology Investments “RTI” and Real Estate.

SCC is a Digital Solutions and Services Provider. It is Europe’s largest independent IT service provider and Rigby Group’s cornerstone business comprising of operations in the UK, France, Spain, Romania and Vietnam.

RTI is Rigby Group’s specialist investment division. It is a leading capital investor for transformative technology businesses, combining our core strengths as seasoned technology operators and ambitious, flexible, investors.

The Real Estate portfolio includes commercial properties, hotels and residential (Allect).



Due to the diverse nature of our businesses, modern slavery statements are published by subsidiaries, where they are required under the Act. This helps ensure our zero-tolerance approach to modern slavery remains meaningful by reflecting how we operate. As such, this statement, covers Rigby Group the ultimate parent company only and not its subsidiaries.

Rigby Group is a head office function directly employing on average 58 people in the year performing activities such as management, property services and finance.

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2.2. GOVERNANCE

The Audit Risk & Remuneration Committee “ARR” has responsibility over financial reporting, risk management and governance, and internal and external audit. The ARR aims to meet quarterly and more frequently if required, and is chaired by non-executive director, George Campion, and members include James Rigby, CEO, Peter Whitfield, CFO, and Julie Mortimer, Rigby Group Director of Finance and Company Secretary.

Divisions are required to maintain an Enterprise Risk Register which identifies and documents key enterprise risks which are then reported to the ARR for discussion. To the extent any concerns or risks regarding modern slavery were to be identified, these would be dealt with the utmost priority, and measures would be implemented to eradicate any such risks to the extent possible. No concerns have been raised in this year’s reporting.

Going forwards, we are looking to complete a review of the Enterprise Risk Inventory during which we will flag to divisions where they should include risks relating to modern slavery (if deemed relevant). The ARR review and approve key corporate policies, including some of those listed in section 3.0, which they expect all divisions to have to in place. They set the tone from the top, demonstrating a strong commitment to integrity and ethical values. Following approval, they are shared with the divisional boards via email. They are also published on the Rigby Group Finance Community. It is the responsibility of divisional management to adopt and implement these policies and ensure appropriate training is provided to staff. When the policies are next issued, we will request divisional boards provide attestation against these policies, or action plans if they believe they have material gaps.

2.3 SUPPLY CHAINS

Our supply chains cover the procurement of goods and services to support the provision of managements services to the Group. The key areas are:

- IT – Support, Maintenance & Software Licenses
- Insurance
- Marketing
- Property Costs
- Professional Fees – Financial & Legal

Most of our supply chain is based in Europe and / or the USA, we do not consider that the countries or sectors from which our supplies are sourced are high-risk from the perspective of modern slavery.

3.0 RELATED POLICIES

Our relevant internal policies continue to consist of:

- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Corporate Criminal Offences (CCO) Policy
- Supplier Code of Conduct
- Equality, Diversity & Inclusion Policy
- Grievance Policy

Our policies are periodically reviewed to ensure they are maintained to the highest standard and are reflective of current legislation and market practices. All policies are available to employees on the HR portal and our Supplier Code of Conduct is published on our website. The policies are recognised as being an important tool for documenting how to conduct ourselves as a business and individually in such a way which is appropriate, transparent and respectful of others. We plan to further strengthen our suite of policies by publishing an Ethics & Business Conduct Policy and a Modern Slavery Policy (which is currently communicated via our published statement).

4.0 DUE DILIGENCE

4.1 SUPPLIER ON-BOARDING

Our Supplier Code of conduct is published on our website and our supplier on-boarding process includes the following checks:

- carry out financial due diligence;
- confirm company details with applicable registers; and
- carry out IR35 and labour provider assessments; and

We completed a review of our top 10 3rd party suppliers in the year, who made up 80% of our spend, and completed the following checks:

- the ultimate parent company is not based in a high-risk country for money laundering; and
- the company has published a modern slavery statement (if it meets the criteria).

None of the suppliers reviewed had ultimate parent companies in a high-risk country, with all being located in either the UK, USA or Ireland.

7 of the 10 suppliers, who made up 73% of total spend, had published a modern slavery statement. The remaining 3 were small companies who did not meet the criteria.

4.2 RECRUITMENT

Recruitment requisition and job offer forms are subject to a three step approval process, and identity and right to work checks are completed as part of our recruitment process. All our current staff are employed directly, however occasionally we may use contractors. Our supplier-onboarding form includes due diligence specific to risks associated with contractors, as included in section 4.1.

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4.3 REPORTING AND REMEDIATION

We have a Whistleblowing Policy and an external service provider via which reports can be made anonymously. This helps ensure any reported issues are highlighted to the executive team as appropriate and properly remedied. We have not received any reports of nor discovered any instances of modern slavery in our business or supply chains. However, were any to arise, the board of directors would take the matter very seriously and act swiftly to take appropriate action up to and including termination of operations with the supplier.

5.0 RISK ASSESSMENT

We assess the potential modern slavery risks of our supply chains by considering the origin of our suppliers and nature of the supply. We do not consider that the countries or sectors from which our supplies are sourced are high-risk from the perspective of modern slavery and will continue to monitor this.

6.0 TRAINING

Training is provided to employees on policies and procedures related to their roles as part of on-boarding and subsequently as required. Based on our risk assessment, a formal training program regarding modern slavery is not considered necessary and this approach will continue to be re-assessed.

7.0 MEASURING EFFECTIVENESS

7.1 LOOKING BACKWARDS

Last year we set the following objectives:

OBJECTIVE SET	PERFORMANCE
Continue to review the Rigby Group's current business objectives to ensure they do not make the supply chain vulnerable to slavery and human trafficking	The mission of Rigby Group is to balance sustainability and profit in the pursuit of technological innovation, and to deliver long-term benefits for our stakeholders and communities.
Further socialise the enhanced supplier onboarding process and the other key relates policies.	Supplier onboarding templates are reviewed and updated for modern slavery related factors, socialised with the divisions, and templates are published on the Rigby Group Finance Community. The ARR review and approve key corporate policies, which they expect all divisions to have to in place. They set the tone from the top, demonstrating a strong commitment to integrity and ethical values. Following approval, they are shared with the divisional boards via email. They are also published on the Rigby Group Finance Community.
Review training available to colleagues;	Training is provided to employees on policies and procedures related to their roles as part of on-boarding and subsequently as required. Based on our risk assessment, a formal training program regarding modern slavery is not considered necessary and this approach will continue to be re-assessed.

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7.2 LOOKING FORWARDS

During the course of the next financial year, we have the following objectives related to modern slavery, underlining our commitment to continual improvement:

- Complete a review of the Enterprise Risk Inventory during which we will flag to divisions where they should include risks relating to modern slavery (if deemed relevant).
- We will request divisional boards provide attestation against the key corporate policies, or action plans if they believe they have material gaps.
- We plan to further strengthen our suite of policies by publishing an Ethics & Business Conduct Policy and a Modern Slavery Policy (which is currently communicated via our published statement).

We reiterate that issues of such severity as slavery and human trafficking are of great importance to the shareholders, which continues to encourage and promote a safe, fair and honest workplace for its staff and those of its suppliers.

This statement was approved by the board of Rigby Group (RG) Plc.

Signed by

Peter Whitfield

CFO Rigby Group (RG) PLC

September 2025