

Anti-Slavery and Human Trafficking Policy

Proptivity UK Ltd

19 September 2026

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Anti-Slavery and Human Trafficking Policy

1. Policy Statement

Proptivity UK Ltd is committed to preventing modern slavery and human trafficking in all aspects of its operations and supply chains. We adopt a zero-tolerance approach and expect the same standards from all our contractors, suppliers, and business partners.

2. Scope

This policy applies to:

- All employees, directors, and officers of Proptivity UK Ltd.
- All subcontractors and suppliers involved in the procurement, installation, maintenance, and support of systems in UK commercial properties.

3. Legal Compliance

Proptivity UK Ltd is not currently required to publish a slavery and human trafficking statement under section 54 of the Modern Slavery Act 2015 because its annual turnover is below £36 million. We nevertheless support the objectives of the Act and review our position annually. As such, we will:

- Publish an annual **Modern Slavery Statement** if our turnover exceeds £36 million.
- Review and update this policy regularly or as required by regulatory change.

4. Responsibilities

- The Board of Directors is responsible for approving this policy.
- The UK Management team are responsible for implementing due diligence and monitoring compliance within Operations and Procurement).

5. Key Commitments

We will:

- Avoid engaging with suppliers or subcontractors known to be involved in slavery or human trafficking.
- Include anti-slavery clauses in contracts with subcontractors and suppliers.
- Provide basic training to staff on identifying and reporting modern slavery risks.
- Maintain a whistleblowing mechanism for reporting concerns.

6. Risk Assessment and Due Diligence

We will:

- Conduct basic risk assessments of our supply chain, focusing on subcontracted services and imported systems.
- Require suppliers to confirm compliance with anti-slavery laws.

7. Reporting and Transparency

- Our Modern Slavery Statement will be published on our website and submitted to the UK government registry (if applicable).
- We will disclose any identified risks or incidents and actions taken.

8. Modern Slavery Transparency

This statement explains the steps Proptivity UK Ltd takes to identify, prevent and manage the risk of modern slavery and human trafficking in its business and supply chains. It is intended to provide transparent, proportionate information for customers, partners and other stakeholders.

Proptivity UK Ltd is not currently required to publish a statement under section 54 of the Modern Slavery Act 2015 because its annual turnover is below the £36 million threshold. We nevertheless support the objectives of the Act and review our position annually.

Proptivity UK Ltd is a company registered in England and Wales (company number 15819816). It is part of the Proptivity group, whose ultimate parent undertaking is NIAM Infra Fund AB. Proptivity UK Ltd provides managed in building cellular connectivity services for commercial and public sector properties in the United Kingdom, including discovery, survey, design, installation, commissioning, integration, monitoring, maintenance and optimisation.

As a result, our supply chain includes technology and equipment manufacturers and distributors, installation and maintenance subcontractors, cabling and fibre providers, specialist design support, professional advisers and other service providers. The nature and scale of the supply chain varies by project.

Our approach is proportionate to our size, sector and supply-chain profile. We seek to prevent and manage modern slavery risk through the following controls:

- risk based assessment of relevant suppliers and subcontractors, with particular attention to labour provision and imported equipment;
- supplier confirmation of compliance with applicable anti slavery laws and standards;
- anti slavery and human trafficking obligations in relevant supplier and subcontractor contracts;
- a decision not to engage, or to escalate concerns about, suppliers or subcontractors known or reasonably suspected to be involved in slavery or human trafficking; and
- ongoing review of supplier performance and any concerns identified during delivery.

Where a concern is identified, the UK Management team will assess the facts and risks, seek appropriate information from the supplier or subcontractor, decide whether remedial action is appropriate, and consider suspension or termination where the risk cannot be satisfactorily addressed.

We recognise that modern slavery risk can exist in any sector or geography. Based on our business model, the areas requiring the greatest attention are:

Area	Why it may carry risk	Our response
Installation and maintenance subcontractors	Subcontracted site labour can create visibility and labour practice risks.	Use risk based supplier assessment, contractual obligations, supplier confirmations and delivery oversight.
Imported technology and equipment	Components may pass through multi tier international supply chains.	Seek supplier compliance confirmation and focus due diligence on relevant manufacturers, distributors and import routes.
Other service providers	Labour practices can vary by service, geography and use of further subcontracting.	Apply proportionate assessment and escalate concerns through management and contractual controls.

We will review the effectiveness of our approach regularly. The following indicators will be recorded and considered by UK Management, with any material findings escalated to the Board:

- number and proportion of relevant new suppliers and subcontractors subject to modern slavery due diligence;
- number and proportion of relevant supplier and subcontractor contracts containing anti-slavery obligations;
- number of modern slavery concerns raised, investigated and resolved, including remedial actions taken;
- number of supplier risk assessments completed or refreshed; and
- staff training completion for relevant roles.

The first annual review against these indicators will establish Proptivity UK Ltd's baseline performance. The outcomes, including any concerns identified and remedial actions taken, will be reviewed by UK Management and escalated to the Board where material.

We provide basic awareness training to staff on identifying and reporting modern slavery risks. Staff in Procurement, Operations and management roles will receive role relevant guidance on supplier due diligence, recognising indicators of exploitation and escalating concerns. Training completion will be recorded and reviewed as part of regular effectiveness reviews.

Approved by:

Proptivity UK Ltd Board, 19 September 2026.

Version: 260919-Proptivity UK Anti slavery policy v1.1
