

Modern Slavery Statement

INTRODUCTION

Charterhouse Voice & Data Limited is committed to doing business responsibly and in accordance with applicable legislation. In this statement we outline how we comply with the Modern Slavery Act 2015 (the “Act”).

COMPANY OVERVIEW

CVD Group is a technology group, providing customers with a range of integrated services spanning connectivity, mobile, networking, security, and unified communications. We partner with some of the industry’s most capable, SaaS, software, and hardware vendors to provide customers with leading solutions.

OUR SUPPLY CHAINS

As a UK based technology company with a professional workforce, CVD Group does not consider its own employees to be at risk from any forms of slavery, forced labour or human trafficking. Employees are offered a competitive remuneration package and CVD Group prides itself on the additional benefits it is able to offer its employees. CVD Group also conducts regular anonymous staff surveys which cover a range of employee issues, and take feedback on board to drive continuous improvement.

Due to the nature of the IT industry, our supply chains are global in nature and include a range of software vendors, original equipment manufacturers, distributors, cloud service providers, and resellers. We trade with the majority of our supply chain through their established companies in the UK or Europe.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains or in any part of our business. We have adopted, maintain and regularly review a Modern Slavery & Human Trafficking Policy. This Policy reinforces our commitment to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our personnel must also adhere to the Charterhouse Code of Conduct which reflects our commitment to acting ethically and with integrity in all our business relationships.

CVD Group will immediately act upon becoming aware of any reports of modern slavery within our supply chain and we will cease trading with any suppliers found by any relevant enforcement authorities or by any other legitimate source to be involved in modern slavery.

OUR DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

The directors of the CVD Group consider its risk of exposure to modern slavery be low. Nevertheless, we have taken steps to monitor and mitigate the risks of slavery and human trafficking occurring in its supply chains. We work with many strategic technology partners to provide technology solutions to our customers, and we have measures in place to check to ensure that key suppliers have robust and comprehensive procedures in place to combat slavery and human trafficking in their own businesses and their own supply chains.

We ensure appropriate provisions are agreed in our contracts to ensure an ongoing commitment to these principles. We periodically review these strategic suppliers to confirm they are continuing to honour these commitments and we may issue questionnaires where we seek additional information to verify compliance.

We have many suppliers who provide Charterhouse with goods and/or services which we consume as a business. As part of our vendor on-boarding process we review these suppliers to ensure they meet our high standards of compliance with these principles.

During FY2023 we launched a Supplier Code of Conduct which underpins our supplier on-boarding procedure, and we have reviewed and enhanced this Code of Conduct annually since. In addition to

setting out core values and principles which we expect from our suppliers, it clearly outlines our zero-tolerance policy in relation to Modern Slavery and Human Trafficking. An extract of this is set out below:

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Charterhouse has a zero-tolerance approach to modern slavery and human trafficking.

Suppliers must comply with the UK Modern Slavery Act 2015. Suppliers must not use or benefit from any form of human trafficking, or forced or compulsory labour of any kind, be it prison, bonded, indentured or otherwise. Mandatory overtime is not permitted, and workers must be allowed to leave their employment after giving reasonable notice. Imposing monetary fines, withholding identity papers (such as passports), work permits, remuneration or requiring recruitment deposits or other constraints as a condition of employment, is not allowed.

ASSESSMENT OF EFFECTIVENESS IN COMBATting RISKS OF MODERN SLAVERY

To ensure the effectiveness in combatting modern slavery, we maintain an accurate record of suppliers, including their contact details to ensure that swift investigation and appropriate action can take place in response to any potential reports of modern slavery in its supply chains.

As is in the previous financial year, there has been no reports that we or any of our suppliers have been involved in activities covered by the Act.

ADHERENCE TO OUR VALUES

Our Legal & Compliance, HR, Procurement and Finance teams work together to ensure our personnel, and our suppliers adhere to these values and principles. We review our policies and procedures regularly to ensure continued best practice.

TRAINING AND AWARENESS

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to new joiners and periodically issue refresher training for existing employees. This training encapsulates a range of important issues, including the Charterhouse Code of Conduct, anti-bribery, anti-corruption, and data protection.

Charterhouse regularly reviews its internal training practices, policies, and procedures, in order to adapt to changing regulations and supply chains. We also have a whistleblowing policy in place which provides employees with another route to report any matters of concern, which could include anything related to modern slavery.

BOARD APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2025. It was approved by the Charterhouse Board of Directors in May 2025.

Signed: David Brooks, CEO