

Overview

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes Fit Out (UK) Holdings Ltd. (Fit Out) annual slavery and human trafficking statement for the financial year ended 31 March 2025.

Introduction

This statement is made on behalf of Fit Out (UK) Holdings Ltd. and its subsidiary companies listed below:

- Fit Out (UK) Ltd.
- PRL Logistics Ltd.

Our statement sets out the steps that the Fit Out Group have taken during the financial year to 31 March 2025 to prevent modern slavery and human trafficking in our business and supply chains. Where relevant, we will also update on priorities, initiatives, or further improvements that we are planning to focus on in 2025/2026 and beyond.

Forced or compulsory labour, human trafficking and other kinds of slavery represent some of the gravest forms of human rights abuse in any society. We all have a responsibility to be alert to the risks in both the Fit Out Group’s business and our supply chain.

The Fit Out Group’s values require that all workers are treated with dignity and respect. We are fundamentally opposed to slavery, human trafficking, forced labour, debt bondage, the sale or exploitation of children and all exploitative practices in the workplace.

This policy applies to all individuals working with or for the Fit Out Group or on the Company’s behalf in any capacity, including employees, directors, agency workers, contractors, consultants and business partners.

Fit Out Group’s Business

The Fit Out Group are an industry-leading interior fit out and logistics service provider. Our core services are:

- Interior fit out
- Rollouts
- Logistics
- Asset refurbishment

We work with a broad range of blue-chip Clients across the retail, hospitality, banking and commercial sectors. We operate across the UK from facilities in London and Yorkshire. Our in-house self-delivery model sets us aside from our competitors, enabling us to complete projects faster, safer and more efficiently from our purpose-built manufacturing and logistics facilities.

Responsibility for the policy

The Directors of the Fit Out Group have overall responsibility for ensuring that this policy complies with the Company’s legal and ethical obligations. The Modern Slavery Steering Group has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery.

They are also responsible for investigating allegations of modern slavery in the Company’s business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

Risk Assessment

In identifying the risk that modern slavery poses to our business, there are a number of steps we took in order to understand the context of our key risks. This included:

- A review with our key clients that provided us with an overview of company-wide policies and approaches to reduce the risk of worker exploitation and modern slavery in our own operations and our supply chains.
- Internal gap analysis of policies and procedures to gain understanding of where focus and resources should be targeted.
- A review of best practice and guidance resources offered by Stronger Together and Unseen
- A review of frameworks for managing modern slavery, including PPN 02/03 – Government Guidance and BS 25700_2022

Specifically, through our operations we are aware that there are activities within our supply chains that we identify as higher risk. These include:

- Construction
- Logistics and warehousing
- Facilities management including cleaning and security
- Labour Agencies

We have identified that some aspects of our business are more susceptible to Modern Slavery issues because we work out-of-hours, at locations away from our Head Office and have a multi-skilled supply chain providing their services to us, including Agency workers.

Addressing the risks

The prevention, detection and reporting of modern slavery in any part of the Fit Out Group or supply chains, is the responsibility of all those working for or with the Fit Out Group, or under the Company's control.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the Company's Disclosures in the Public Interest Policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of Fit Out business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager.

You can also contact the Government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

Fit Out aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Fit Out is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Sustainable Procurement policy

The Sustainable Procurement policy assists all employees in meeting minimum supply chain requirements and delivers benefits through better selection of products and services.

We are committed to providing a great place to work for our employees, and this is at the heart of our business strategy. We comply with local minimum age and wage laws and do not employ child labour.

Modern Slavery and Human Trafficking Policy Statement

All of our employees (i.e., those who are paid directly) are:

- paid by bank transfer; we do not allow payment to be made into third party bank accounts, thus minimising the risk of forced or compulsory labour. All employees receive details of hours worked/pay (within their payslips) when they are paid, and this must also clearly show deductions for tax and social security contributions; and
- vetted for the right to work in the country where they are employed. Where employees require a work permit/VISA we ensure they have the necessary documentation in place.

Code of ethics and business conduct

The code of ethics and business conduct provides a set of guiding principles to ensure that our business and our employees comply with all laws and regulations in an appropriate manner.

We would consider termination of business relations with any contractor or supplier found to be in serious or deliberate breach of anti-slavery and/or human trafficking obligations. We would only seek this ultimate sanction as a last resort, preferring to work with members of our supply chain to assist in the education and improvement process, where possible, and also in cases where relevant suppliers show a willingness to learn and improve.

Our zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

Whistleblowing Policy

As a responsible employer, we take the welfare of our employees (and others working on our behalf) seriously. Our Whistleblowing Policy encourages employees to report wrongdoing (including exploitation) in any form. We are committed to investigating all matters raised through our Whistleblowing Policy through robust and transparent processes.

Supply Chain Management

As part of our sub-contractor due diligence pre-qualification (PQQ) procedures, we vet our sub-contractors through a due diligence process. All potential new sub-contractors, who progress through our pre-qualification process, are required to sign up to our 'anti-slavery and human trafficking supply chain commitment' (the "Supply Chain Commitment") before they can be classed as an approved sub-contractor.

We also work with a large variety of other suppliers both in the UK and overseas. We are committed to ensuring that all our supplier groups, wherever they are working, sign up to our Supply Chain Commitment and wider due diligence procedures.

We operate an on-site pre-enrolment system. This requires sub-contractors to provide information about their employees before they commence work on site, and allows for individual sub-contractors, who are working on our sites, to be provided with key information prior to arriving on-site. In 2025/2026 we will continue the process of further embedding and developing this system into the site operations of our many and varied project sites.

We will start to audit the right to work and modern slavery status of our sub-contractors, having identified those suppliers and trades which are considered to be high risk. This will include:

- Supply Chain right to work & modern slavery compliance audit – this is a risk-based audit, focusing on reviewing subcontractor's internal governance policies and workers' right to work documentation.
- Project based right to work & modern slavery compliance audit – this is an evidence-based audit, to provide us with greater visibility of modern slavery risks in our supply chain and in our suppliers' supply chain.

We hope that through these audits, we will helpfully identify areas for improvement within our supply chains, to include a better focus on right to work documentation, and ensuring the legibility and completeness of information.

Training/awareness

We have a programme of modern slavery awareness training within the Fit Out Group.

Our Directors and Senior Management have attended face to face training delivered by Unseen.

An update on modern slavery and awareness is included in our UK on-site and online health & safety induction training processes.

Relevant employees within the group (to include those working in supply chain, procurement, human resources, health & safety, and senior on-site roles) are required to complete a modern slavery and human trafficking e-Learning training module. This course covers the requirements of the Act, our obligations, our supply chain expectations, and the potential consequences for non-compliance. It also confirms reporting routes for employees who may have slavery and/or forced labour concerns for fellow employees or members of our supply chain teams.

Elements of our supply chain are also encouraged to subscribe to e-Learning modules run by the Supply Chain Sustainability School, Unseen or Stronger Together.

Measuring effectiveness

We continue to work on developing Modern Slavery key performance indicators that we will use to measure the effectiveness of communicating awareness of core policies and procedures, and our actions to address modern slavery risks.

Ongoing review and development

We continue to review and evolve our anti-slavery and human trafficking policies and procedures, as we progress towards the adoption of a common approach throughout our global businesses.

During 2025, the Fit Out Group will continue, and where appropriate update, the training on modern slavery and human trafficking provided. We will:

- continue 'right to work' checks and balances amongst our supply chain through project-based right to work and modern slavery compliance audits.
- further refine anti-slavery key performance indicators.
- Further engage our internal anti-slavery forum, which was established in 2024. Through this forum, progress made to date with our various anti-slavery initiatives, ongoing priorities, and resource requirements are reviewed.
- Promote our Whistleblowing Policy to reinforce the message to our employees (and particularly our on-site operatives who work through our sub-contractor supply chains) that slavery or forced labour concerns can be reported through such routes.
- Work towards the business partnership with our chosen not-for-profit organisation, which can provide business support and training in tackling labour exploitation.
- Continue regular governance training at a Director/Senior Manager level by developing a training plan
- Develop and implement a Modern Slavery procedures, including our modern slavery risk assessment protocols for site, mapping of our supply chain risks and vetting of Agencies that we use for labour provision

Breach of the policy

Any employee who knowingly breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Board of Fit Out fully endorse this policy and are wholly committed to eradicating modern slavery issues in its supply chain. We will review this policy statement and our achievements at least annually, or more frequently should we identify any issues of concern.

Signed on behalf of Fit Out (UK) Holdings Ltd by:



[Stephen O'Sullivan \(Jul 30, 2025 14:35:06 GMT+1\)](#)

Stephen O'Sullivan,
Director

11th April 2025