

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Financial year ending: 31 December 2025

(UK Modern Slavery Act 2015 – Section 54)

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Keyrus Limited (“Keyrus UK”) to prevent modern slavery and human trafficking within its business and supply chains during the financial year ending 31 December 2025.

Keyrus UK recognises that modern slavery is a crime and a serious violation of fundamental human rights. We take a zerotolerance approach to modern slavery and human trafficking and are committed to acting ethically, responsibly, and with integrity in all our business dealings and relationships.

Our Business and Supply Chains

Keyrus UK is part of the Keyrus Group and operates in the United Kingdom as a professional services organisation providing consulting and advisory services.

Our supply chains primarily relate to:

- Professional and consulting services
- Recruitment and contingent labour providers
- Technology and software vendors
- Corporate and support services

Due to the nature of our activities, we consider the risk of modern slavery within our direct operations to be low. We recognise, however, that risks may arise within thirdparty supply chains, particularly where labour is subcontracted.

Policies and Governance

Keyrus UK maintains an AntiSlavery and Human Trafficking Policy that applies to all individuals working for or on behalf of the Company, including employees, directors, contractors, agency workers, interns, volunteers, and business partners.

The policy:

- Confirms a zerotolerance approach to modern slavery
- Defines responsibilities for prevention, escalation, and compliance
- Requires suppliers and partners to uphold equivalent standards
- Supports reporting through management, HR, and whistleblowing channels
- Protects individuals who raise concerns in good faith from retaliation

Overall accountability for the policy rests with the Company, with primary responsibility for implementation and review assigned to the HR function.



Due Diligence and Risk Management

Keyrus UK seeks to take reasonable and proportionate steps to identify and mitigate modern slavery risks within its business and supply chains.

These steps may include:

- Riskbased considerations during supplier onboarding and contracting
- Contractual prohibitions on forced, compulsory, or trafficked labour
- Supplier confirmations of compliance with antislavery standards
- Expectations that suppliers apply similar standards within their own supply chains

Where concerns are identified, we aim to work constructively with suppliers to address risks, prioritising the welfare and safety of workers.

Training and Awareness

All employees are required to read and understand the AntiSlavery and Human Trafficking Policy on joining the Company. Managers are responsible for promoting awareness of modern slavery risks and escalating concerns promptly and appropriately. As part of our ongoing commitment, Keyrus UK intends to develop and embed further awareness training in the coming year.

Reporting and Whistleblowing

Keyrus UK encourages openness and transparency. Individuals are expected to report any concerns relating to modern slavery within our business or supply chains through line management, HR, or whistleblowing arrangements. No individual will suffer detriment for raising concerns in good faith.

Effectiveness and Review


Keyrus UK recognises that addressing modern slavery risks is an ongoing process. We are committed to reviewing and improving our policies and controls to ensure they remain effective and proportionate. We are committed to developing appropriate indicators over time and to reviewing and improving our policies and controls on an ongoing basis. We will use our experience during the coming year to identify meaningful measures and report on progress in our next annual statement.



Approval

This statement has been approved by the Board of Directors of Keyrus Limited and is reviewed annually.

Signed:

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Director, Keyrus Limited

Date: 12th May 2026

