Policy Name: Modern Slavery Statement

Policy Reference: RG-POL-005

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Date: September 2026

Author: Jack Garratt

Revision History:

Revision No.	Date	Summary of changes	Reviewer
v1.0.0	19.06.25	2025 Statement	Mark Lee
v1.1.0	07.09.26	2026 Statement	Mark Lee

Modern Slavery Statement

TIEVA Ltd has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and trafficking is not taking place anywhere in its own business or supply chains. These legal and ethical obligations align with requirements in the Modern Slavery Act 2015.

Structure and Operations

TIEVA Ltd is a leading provider of IT services and solutions to UK SME, mid-market, enterprise and public sectors.

TIEVA includes the following entities:

- Pure Data Solutions Ltd, The Mill II, Holly Park Mills, Calverley, LS28 5QS
- Servatech Ltd, The Mill II, Holly Park Mills, Calverley, LS28 5QS
- Prodec Networks Ltd, TIEVA, Suite 04 1010 Eskdale Road, Winnersh Triangle, Wokingham, England, RG41 5TS

While Prodec Networks Ltd is a legally distinct entity, it operates under the TIEVA name and is therefore included in the scope of the statement and policy. This ensures a consistent and groupwide approach to identifying and mitigating the risk of modern slavery.

TIEVA currently has 231 employees and a combined turnover of approximately £98m for the financial year 1st January 2025 to 31st December 2025. Our supply chain primarily comprises technology distributors, software providers, telecommunications providers, and other business support services.

Policies and Governance

We have a Modern Slavery Policy, which is reviewed annually. The policy clearly identifies expectations of its people and supply chain. We are committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout the supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015.

The policy applies universally to all employees, contractors, suppliers and third parties acting on our behalf. The Board of Directors has overall responsibility for ensuring the policy complies with our legal and ethical obligations and the Commercial Director has primary and day-to-day responsibility for implementing the policy.

We significantly strengthened our policy framework, explicitly requiring new suppliers to inform us of their modern slavery position. During 2025, we continued rolling out an enhanced supplier due diligence process to both existing and new suppliers through our supplier (vendor) review process.

Due Diligence

All employees are instructed to read this policy and confirm understanding and agreement to comply. The prevention, detection and reporting of modern slavery in any part of the business or supply chain is the responsibility of all working for TIEVA or under its control.

Anyone who believes or suspects that a conflict with the policy has occurred or may occur in the future, must notify their manager immediately who will take appropriate action. We encourage openness and will support anyone who raises genuine concerns in good faith.

All supply chain entities (suppliers, partners and vendors) are carefully evaluated, and their own commitment and due diligence confirmed to ensure that they also comply with the law. This is confirmed at the "supplier on-boarding" stage and subsequent ad-hoc supplier reviews and audits, through the "Supplier/Vendor Review Process". This is conducted using a risk-based approach.

Training and Awareness

We have mandatory training programs that cover modern slavery risks, prevention and detection for all staff. 100% of staff have completed this training, which emphasises TIEVA's commitment to reducing the risk of modern slavery.

Risk Assessment and Management

We have a risk-based methodology in place to ensure its suppliers comply with The Modern Slavery Act 2015. Risks are generally assessed as low however, we recognise that some supply chain activities may present increased inherent modern slavery risks.

It is also recognised that risks are lower for UK employees due to the legislative requirements. The risk assessment process is managed by the Head of Distribution and Vendor Alliance who also has responsibility for ensuring annual or ad-hoc reviews and audits of all suppliers is undertaken.

Reporting and Whistleblowing

One of TIEVA's key values is "Have Courage" which empowers our employees to speak up when they have concerns. We will continue to foster this culture of openness and accountability to encourage anyone with concerns or suspicions regarding modern slavery to report them without fear of retaliation.

Our confidential reporting mechanism is supported by clear, accessible channels and we are committed to investigating all concerns raised promptly and thoroughly.

Effectiveness

Supply chain risk assessments are undertaken, and no issues have been identified during the onboarding process or scheduled audits and reviews during financial year ending 31st December 2025. However, we recognise the potential hidden nature of such risks, and we remain committed to proactive vigilance and continuous improvement.

We track effectiveness through measurable KPI's, including supplier audit coverage, training completion rates and timeliness of addressing reported concerns. These metrics are reviewed bi-annually by our leadership team and reported annually to the board of directors.

Future Commitment

Looking forward we will:

- Continue expanding supplier reviews and due diligence activities across our supplier base using a risk-based approach.
- Continue to enrol all new staff in training and roll out engaging annual refresher training.
- Enhance collaboration with external organisations and industry bodies to adopt best practices and continuously strengthen our anti-slavery initiatives.

Approval

This statement has been approved by the Board of Directors and relates to the financial year ending 31st December 2025 and is signed by:

Mark Lee

Mark Lee

Chief Executive Officer