

### Modern Slavery Statement

This statement by Harrow Green Limited has been published in accordance with Section 54 of the Modern Slavery Act 2015. It has been approved by the Harrow Green Board on behalf of the Group and signed on behalf of Harrow Green by Tim Ryder – Managing Director

#### Our Commitment

Harrow Green is committed to respecting and supporting all internationally recognised human rights and the treatment of all workers with dignity and respect. Harrow Green operates a zero-tolerance policy in respect of all forms of modern slavery and human trafficking within its business and across our supply chains. We take all allegations of human rights abuse seriously. To report any concerns around suspected misconduct, including breach of human rights or the Modern Slavery Act 2015, you may report the issue via Harrow Green's confidential and independent reporting service by telephoning 0800 915 1571 or reporting online at [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

#### Our Business

Harrow Green is the UK's leading provider of Business Relocation (including office and commercial moving and life science logistics and storage) in both public and private sectors with 2024 annual revenues of c.£35m.

#### Our Risk Assessment and Management

Harrow Green operates principally in the UK and primarily with UK-based suppliers. Whilst this does not shield us from exposure to modern slavery risk, we assess the risk to be very low. The most likely sources for this risk come from our use of temporary staff to meet short-term customer demand spikes and projects, and our extended supply chain.

For the former we have robust controls for the selection and assurance of employment agencies (see Our People below). For the latter, we are seeking to further improve our on-boarding and on-going supplier due diligence and to better understand what due diligence our suppliers carry out on their supply chain. We are continually exploring ways to enhance our procurement controls (see Our Supply Chain below).

To date, Harrow Green has not received any reported instances of modern slavery, actual or perceived. However, we remain vigilant and continuously challenge ourselves to better understand the risk and the associated controls.

#### Our People

Harrow Green operates across four different markets each with its own skill requirements. As at 1st June 2025, Harrow Green employed c.340 people. All of our managers and leaders are onboarded into the business through a rigorous selection process. The majority of our operative workforce are on permanent contracts delivering services to our customers. These are augmented by temporary agency workers sourced from suitably assured agencies.

We operate a stringent vetting processes required by these requirements, and those of our customers, to ensure that Harrow Green is both legally compliant and also compliant with the varying requirements of our customers depending on the nature of their business and the regulations that they themselves are subject to. As mandated in our Right to Work and Screening Policy, all employees are subject to thorough right to work checks and pre-employment screening (which will vary depending on the nature and seniority of the role). In addition, employees may also be subject to a Baseline Personnel Security Standard (BPSS) check, a BS7858 check, a DBS check and also a Security Check (SC)/Developed Vetting (DV) Clearance, again in each case depending on the role, as well as the legal and contractual requirements relevant to the nature of the information processed by an individual.

We continue to operate additional governance around our agency providers to ensure that we understand, track, and monitor the specific workers that are being provided. Every contingent labour supplier is required to sign up to terms to adhere to our policies and requirements, which includes the right to audit.

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As a business, we continue to encourage employees to spend the majority of their working week in our offices and sites where possible, whilst acknowledging the long-term structural shift towards more flexible working patterns. We do believe that being physically present in an office environment has benefits, not least to help our People and Management teams to maintain personal contact with our workforce. In order to support flexible working and the continued improvement of information flows across

Harrow Green has a Flexible Working Policy and comprehensive, supported communication and information channels and provides for participative workforce forums.

In late 2024 we implemented a new third party on-boarding platform (Eploy). This has strengthened our group-wide onboarding approach across the Group and ensures a trackable audit trail of pre-onboarding requirements as well as reportable, digital acceptance of employment terms and conditions and reporting for both candidate and hiring manager tasks. In addition, the platform requires new employees to read and confirm acceptance of key compliance policies, including Harrow Green's Code of Conduct, as well as other policies specific to certain roles.

#### Our Governance

The following describes the specific responsibilities of the governance bodies within this structure:

1. Tim Ryder – Managing Director, and the Harrow Green Board hold ultimate responsibility for our ethics and compliance framework, including our Code of Conduct which (amongst other things) sets out our commitments on respecting human rights and preventing modern slavery. Compliance policies across the Harrow Green Group are regularly reviewed (typically annually) with any new policies or material changes to existing policies being approved by the Board.
2. The Executive and Risk Committees, consisting of the Managing Director, Divisional Directors and Finance Director/Company Secretary and other specialist representation keeps ethics and compliance risks across each division under review, including in relation to human rights, modern slavery, and human trafficking. In addition they are responsible for upholding our modern slavery commitment across our contracts and external relationships. They do this by ensuring the identification, prevention, and mitigation of any adverse human rights, modern slavery and human trafficking impacts caused or contributed to by Harrow Green operations. They also monitor the actions of our customers, suppliers, business partners and other third parties.

#### Our Policies

Harrow Green's compliance programme is led by the Managing Director as supported by the Heads of Compliance and their respective teams for each division. Our compliance policies are available via our website or upon request.

All policies are regularly reviewed and updated as required.

#### Our Training

We mandate regular on-line compliance training, including in relation to Modern Slavery, to management teams and other relevant staff members. The on-line training platform was updated in 2024 to improve the user experience and the range of training materials available. Importantly the training platform is accessible via an app, which helps us reach colleagues who may not have a computer but will have a smartphone. All employees are required to complete certain mandatory training programmes on an annual basis and the platform allows completion levels to be monitored and followed-up on as required.

The modern slavery training module is designed to raise awareness of slavery and human trafficking in all its forms, to inform colleagues of some of the more obvious indicators that should trigger concern and to empower them to take the right action should they suspect something to be amiss. Additionally, our intranet site has further information, links and videos for our colleagues to access on the topic of modern slavery.

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#### Our Supply Chain

As a UK-based business services provider, our supply chain is predominantly UK-based; suppliers are therefore subject to the same modern slavery legislation as ourselves. The majority of our large suppliers exist in structured markets and provide services to us, for example, property, information technology and energy providers. We therefore assess our supply chain modern slavery exposure to be very low. We seek to ensure that our suppliers maintain these standards through our divisions' procurement processes which require suppliers to undertake a supplier on-boarding process and, where possible, to sign up to our standard supplier terms and conditions which require adherence to certain mandatory Harrow Green policies.

Our supplier on-boarding and due diligence capability has been enhanced during H1 2025 through our partnership with Achilles, our preferred platform for supply chain risk assessment. This will enhance the rigour and efficiency of our supplier on-boarding process and allow us to replace our manual questionnaire processes with a more scalable and consistent process.

Our initial focus has been on on-boarding our existing key suppliers on the platform (based on spend and criticality). The next steps for the remainder of 2025 and beyond include:

- updating and enhancing our on-boarding process for new suppliers to incorporate the Achilles process and to ensure a consistent approach across our divisions; and
- continuing the on-boarding of our existing suppliers and risk assessing.

Signed on behalf of Harrow Green Limited



Tim Ryder – Managing Director