

XANTARO SLAVERY AND HUMAN TRAFFICKING STATEMENT

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This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and outlines the steps taken during this financial year ending August 31st 2026 by Xantaro UK Ltd. (hereinafter “Xantaro”) to prevent modern slavery and human trafficking in our operations.

Our Business:

Xantaro are one of the leading solution providers for high-performance networks with over 300 customers in Germany and the UK. We support the entire lifecycle of the network infrastructure- from design and operational support to innovative software tools for automation and predictive network management. Our supply chain comprises: (i) Original Equipment Manufacturers (OEMs) and distributors supplying network hardware and software, (ii) carriers/telecommunications service providers supplying network access and related services and (iii) specialist services and subcontractors (e.g., field engineers, logistics, facilities). Depending on the contract, certain partners may act as our customers in some engagements and as our suppliers in others; we determine their status at contract level and apply the appropriate controls.

Our commitment, policies and governance:

We are firmly opposed to all forms of modern slavery, including forced labour, child labour and human trafficking. We strive to ensure that our business and supply chains are free from such practices.

Risk Assessment & Due Diligence:

While inherent risk varies by category, we recognise potential risks in third-party labour (field engineers, logistics, facilities); and carrier-provided field services where subcontracting may occur beyond first tier. We proactively mitigate modern slavery risks by:

- ❖ Vetting suppliers and partners for ethical standards
- ❖ Avoiding engagement with high-risk jurisdictions or industries
- ❖ Maintaining open communication with all employees

Policies:

We have implemented the following policies:

- ❖ Code of Conduct: All Staff and Partners are expected to uphold human rights and fair labour practices.
- ❖ Whistleblowing Policy: Individuals can report concerns anonymously and without fear of retaliation.

Training & Awareness:

Xantaro ensure that all UK Staff have taken part in modern slavery training and are competent to understand the risks and how to identify and report concerns.

Measuring Effectiveness:

We review our practices annually and monitor:

- ❖ Internal Compliance
- ❖ Any reported incidents
- ❖ Changes in risk exposure due to business growth or expansion.

Future Steps:

- ❖ Formalise supplier audits
- ❖ Expand Training resources
- ❖ Collaborate with ethical sourcing initiatives

Approval and publication:

This Statement was approved by the Board of Xantaro UK Ltd. and signed by the Director named below. It is published on our website and linked prominently from the homepage.

Mark Hutchinson

A handwritten signature in black ink, appearing to read 'M Hutchinson'.

Managing Director

15th September 2025

