

Modern Slavery Statement

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PREPARED BY: Group Legal

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Revision history

Version	Status	Date	By	Summary
v 4.1	Superseded	13 June 2022	Group Legal	Annual review and update
v 5.0	Superseded	06 June 2023	Group Legal	Annual review and update, including branding.
v 5.1	Superseded	14 June 2024	Group Legal	Annual review and update
v 5.2	Superseded	02 June 2025	Group Legal	Annual review and update
v 6.0	Current	18 June 2026	Group Legal	Annual review and update

Sign-off

Version	Date	By	Title	Signature
v 4.1	30 June 2022	Alasdair Marnoch on behalf of the Board	Group CFO	Electronically Signed
v 5.0	14 June 2023	Andreis van Staden on behalf of the Board	Group CFO	Electronically Signed
v 5.1	25 June 2024	Magdalena Baugh on behalf of the Board	Group CFO	Electronically Signed
v 5.2	19 June 2025	Magdalena Baugh on behalf of the Board	Group CFO	Electronically Signed
v 6.0	25 June 2026	Mike Hynd on behalf of the Board	Group CFO	<i>Mike Hynd</i> <small>Mike Hynd (Jul 25, 2026 16:39:06 GMT+1)</small>

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Statement

1. Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement of Innovation Group Holdings Limited and its group companies, including those UK subsidiaries listed in the Annex to this statement ("Innovation Group", the "Group", "we", "our"), for the financial year ending 31 December 2025. It has been approved by the Board on 25 June 2026.

This statement outlines the steps taken by Innovation Group during the financial year to identify, assess, mitigate and address the risk of modern slavery within our operations and supply chains.

There have been no reported instances of modern slavery relating to our Company during the financial year covered by this statement.

2. About Innovation Group

Innovation Group is a global provider of business process services that manages critical incidents in the car and home on behalf of the world's leading insurers, brokers and fleet managers. The Group also provides warranty, maintenance and service plan solutions for automotive manufacturers and dealerships as well as providing specialist software solutions to the insurance industry.

The Group employs over 2220 employees in the United Kingdom, Europe and Africa and had an annual group turnover of £262.8 million for the period to 31 December 2025.

Our approach forms part of our wider commitment to responsible business practices and respect for human rights across our operations and supply chains.

3. Commitment to Human Rights

Innovation Group is committed to ensuring our business dealings are carried out in compliance with relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited. The Company is committed to preventing slavery and human trafficking in its corporate activities and ensuring that its supply chains are free from all forms of modern slavery.

We are committed to upholding internationally recognised human rights and ensuring that neither our operations nor our supply chains contribute to human rights abuses.

We adopt a zero-tolerance approach to modern slavery, including forced labour, human trafficking and child labour. This commitment forms part of our broader approach to responsible business practices and ethical conduct.

Our approach is underpinned by our internal policies, governance frameworks and supplier management processes.

4. Risk Assessment in Our Operations and Supply Chains

The risk of modern slavery within our own operations is assessed as low due to the nature of the services we provide.

The Company does not operate in sectors typically associated with higher modern slavery risk, such as manufacturing or labour-intensive production. However, we recognise that risks may still arise within supply chains and third-party relationships. We therefore require appropriate oversight and management and adopt a proportionate, risk-based approach to identifying and mitigating these risks.

5. Preventing Modern Slavery

5.1. Supplier Due Diligence and Onboarding

We adopt a structured risk-based approach to supplier onboarding and management.

Before engaging suppliers, we undertake due diligence checks to assess their suitability, including requiring suppliers to complete due diligence questionnaires and provide supporting evidence.

Our approach takes into account factors such as:

- the nature of services provided;
- geographical location;
- the use of subcontractors.

Suppliers are subject to ongoing monitoring to ensure continued adherence to our standards.

As part of our approach to reducing the risk of modern slavery within our supply chain, we have implemented a number of controls, including:

- implementation of a procurement policy to ensure employees understand and effectively communicate expectations applied to the supply chain;
- requiring suppliers to complete detailed due diligence questionnaires supported by appropriate evidence;
- conducting annual supplier checks to reconfirm adherence to our standards; and
- incorporating contractual obligations requiring compliance with modern slavery laws, with breaches not tolerated.

These measures are designed to ensure that our supply chain remains aligned with our ethical standards and applicable legal requirements.

5.2. Contractual Safeguards

Suppliers are required to comply with applicable modern slavery and human rights laws and to ensure that, where relevant, the same standards are applied within their own supply chains.

Our contracts require suppliers to meet these standards and include measures designed to ensure compliance. These may include requirements to:

- confirm their compliance with modern slavery laws;
- maintain policies and procedures to prevent modern slavery;
- report any concerns, risks or breaches to Innovation Group; and
- provide information or evidence demonstrating compliance where requested.

If a supplier fails to meet these requirements, this may result in action being taken, including the termination of the business relationship.

5.3. Supply Chain Management and Monitoring

Innovation Group has procedures in place to ensure that there is oversight over the selection and management of all third-party suppliers to help drive improvements in working conditions across the supply chains. These procedures include periodic reviews, due diligence, annual supplier checks, contractual requirements and ongoing relationship management to ensure continued alignment with our standards and. Our strong relationships with suppliers have been key to identifying and managing these risks and ensuring that there has been no resulting increased risk of modern slavery issues. In addition, employees responsible for managing suppliers and others involved with the Group are, themselves, responsible for ensuring that our values are upheld. Serious violations by suppliers will lead to the termination of the business relationship.

These processes are designed to ensure that the supply chain remains compliant and aligned with the ethical standards expected by Innovation Group.

5.4. Policies and Governance

Our expectations of ethical conduct of how members of our workforce should engage with each other, our customers, our suppliers and the wider community are set out in our Code of Conduct, which informs our engagement with suppliers and other business partners.

We encourage all our workers, customers and other business partners to report any concerns related to the supply chains or any direct activities of the organisation. This includes any circumstances that may give rise to an enhanced

risk of slavery or human trafficking. The Company's whistle blowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Supporting policies, including procurement and supplier engagement processes provide a framework for preventing modern slavery and unethical business practices.

5.5. Training and awareness

We provide training to our employees to raise awareness of modern slavery risks and enable them to identify and report potential concerns including via our whistle blowing system.

Training is delivered as part of onboarding by every employee and refreshed periodically.

This includes, where relevant:

- Recognising indicators of modern slavery;
- Understanding escalation and reporting procedures; and
- Awareness of ethical business conduct and supply chain risks.

5.6. Recruitment and Selection

We use reputable recruitment agencies and implement appropriate checks and controls to ensure all employees have the right to work and are protected under applicable employment legislation. This includes checking right-to-work documents, visas and passports.

We prohibit the use of child labour in any form. Individuals who are legally permitted to work but are under the age of 18 may be employed or offered work experience, provided this is carried out in full compliance with applicable laws. Such individuals are afforded appropriate protections and safeguards consistent with their age and level of experience.

We promote fair working conditions, including:

- The right to a reasonable wage
- The right to a safe working environment
- The right to appropriate leave and sickness provisions; and
- access to grievance and reporting mechanisms.

We also seek to ensure that recruitment practices are fair, transparent and compliant with applicable employment laws.

6. Monitoring and Effectiveness

We monitor the effectiveness of our actions to prevent modern slavery through:

- Supplier due diligence completion and review processes;
- Internal review and oversight mechanisms;
- Employee training completion rates;
- Reporting and escalation channels.

We are in the process of exploring whether the use of key performance indicators can be developed to strengthen oversight and accountability in this area.

7. Continuous Improvement

Innovation Group fully accepts we have an ongoing responsibility.

We are committed to continuous improvement, including:

- Strengthening supplier due diligence and screening processes;
- Enhancing existing supplier checks and increasing audit activity;
- Improving supplier assessment methodologies;

- Further embedding awareness through training; and
- Reviewing and updating policies and procedures in line with evolving legal and regulatory expectations to ensure that human trafficking and all other forms of modern slavery are prohibited, and not tolerated, within our Company or Supply Chains and that it is given proper consideration at the highest level. We shall ensure that adequate and effective arrangements along with appropriate resources are provided to meet the objectives of our Modern Slavery Policy.

8. Governance, Approval and Publication

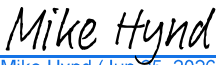
Responsibility for the success of this policy:

The Board of Directors of Innovation Group Holdings Limited (the "Board") has overall responsibility for this Statement and our Modern Slavery policy, and for reviewing the effectiveness of actions taken in response to any breaches raised in connection with this Statement or its related policy.

The Board shall review this statement annually and oversees the implementation of related policies and procedures, including this statements publication on our website.

This Statement has been approved by the Board and signed on its behalf.

Signed:



[Mike Hynd \(Jun 25, 2026 16:39:06 GMT+1\)](#)

Director, Innovation Group Holdings Limited

Annex to Modern Slavery Statement

Innovation Group Holdings Limited, UK subsidiary companies:

- Axios Bidco Limited
- The Innovation Group Limited
- The Innovation Group (EMEA) Limited
- Motorcare Services Limited
- Innovation Property (UK) Limited
- EMaC Limited
- Innovation Group Business Services Limited