Bromcom Computers Plc

Modern Slavery and Human Trafficking Statement

Publication Date: 02/11/2026

1. Introduction

This Modern Slavery and Human Trafficking Statement is made pursuant to section 54 of the Modern Slavery Act 2015.

Bromcom Computers Plc ("**Bromcom**", "**we**", "**our**" or "**us**") is committed to acting ethically and with integrity in all our business dealings and relationships. We recognise that modern slavery, forced labour, servitude and human trafficking are serious violations of human rights and have no place in our business or supply chains.

This statement sets out the steps taken by Bromcom during the financial year ended 31 December 2025 to prevent modern slavery and human trafficking within our business and supply chains.

2. Our Organisation

Bromcom Computers Plc is a UK-based provider of cloud-based education software solutions serving schools, multi-academy trusts, local authorities and education agencies.

Our principal products and services include:

- Management Information Systems (MIS);
- Financial Management Systems (FMS);
- Education software platforms and related services;
- Customer support, implementation and training services.

We operate primarily within the United Kingdom and work with a range of suppliers and business partners that support the delivery of our products and services.

3. Our Supply Chains

Our supply chain includes organisations that provide goods and services necessary to support our business operations and customer services.

These may include:

- Cloud hosting and infrastructure providers;
- Technology and software vendors;
- Professional advisers and consultancy services;
- Recruitment and workforce providers;

- Facilities and operational service providers;
- Hardware and equipment suppliers;
- Other business support services.

We recognise that modern slavery risks may arise at different levels of the supply chain and that ongoing vigilance is required to identify and address such risks.

4. Our Commitment

Bromcom maintains a zero-tolerance approach to modern slavery and human trafficking.

We are committed to:

- Conducting business ethically and responsibly;
- Respecting internationally recognised human rights;
- Taking reasonable and proportionate steps to identify and address modern slavery risks;
- Promoting transparency across our business relationships; and
- Encouraging the reporting of concerns.

5. Governance and Responsibility

Responsibility for overseeing Bromcom's approach to modern slavery rests with senior management. The Board maintains overall responsibility for ensuring that appropriate policies, controls and governance arrangements are in place to support compliance with applicable legal and regulatory requirements.

Day-to-day responsibility for implementation, monitoring and reporting sits with Human Resources department.

Human Resources is responsible for maintaining relevant employment policies and procedures, supporting employee awareness, overseeing recruitment and onboarding practices, and managing concerns raised through established HR, grievance and whistleblowing procedures.

Bromcom reviews its policies and procedures periodically, including as part of the employee handbook review process, to ensure they remain appropriate and aligned with applicable legal and regulatory requirements.

Policies and procedures are reviewed periodically, including through the annual employee handbook review process, to ensure they remain appropriate and aligned with applicable legal and regulatory requirements. Concerns relating to potential modern slavery, human trafficking or exploitation are escalated through the Human Resources department and reviewed in accordance with Bromcom's internal procedures.

Where concerns are identified, Bromcom's response will generally be guided by the following principles:

Identify → Protect → Investigate → Remediate → Prevent recurrence → Record → Report

Identify: Recognise and assess suspected modern slavery or human trafficking concerns.

Protect: Prioritise the safety, welfare and immediate needs of affected individuals.

Investigate: Establish the facts promptly, sensitively and confidentially.

Remediate: Take appropriate action to stop exploitation, address harm and support affected individuals.

Prevent recurrence: Strengthen controls, address root causes and require corrective action where necessary.

Record: Document concerns, decisions, evidence, actions taken and outcomes securely.

Report: Escalate to appropriate senior management and report to relevant authorities where appropriate or legally required.

6. Policies

Bromcom's approach to preventing modern slavery is supported by a range of policies and procedures.

During the reporting period, Bromcom strengthened its modern slavery compliance framework through the introduction of a Modern Slavery Policy and Supplier Code of Conduct. These sit alongside our existing Whistleblowing Policy, Recruitment and Employment Policies, Employee Code of Conduct and other relevant compliance and governance policies.

Bromcom reviews its policies periodically and undertakes an annual review of policies and procedures as part of the employee handbook update process to ensure they remain appropriate, up to date and aligned with legal and regulatory requirements.

7. Due Diligence Processes

Bromcom recognises the importance of undertaking appropriate and proportionate due diligence in relation to modern slavery risks within its supply chain. During the reporting period, Bromcom reviewed its approach to supplier due diligence and identified a number of measures that may be implemented as part of its developing modern slavery framework, including supplier questionnaires, supplier risk assessment processes and contractual controls.

Bromcom intends to incorporate these measures into its supplier management processes and will continue to review and develop its due diligence framework to support the identification, assessment and management of modern slavery risks within its supply chain.

8. Risk Assessment and Risk Management

Bromcom recognises that modern slavery risks vary depending on factors such as:

- The type of goods or services provided;
- Geographic location;
- Workforce characteristics;
- Use of subcontractors;
- Industry sector and operating environment; and
- Supply chain complexity.

Bromcom recognises the importance of identifying and managing modern slavery risks within its supply chain. As part of its developing modern slavery framework, Bromcom maintains records of supplier contractual arrangements and intends to consider modern slavery risks when entering into new supplier relationships and when existing supplier contracts are renewed.

Where appropriate, Bromcom intends to seek contractual commitments from suppliers regarding compliance with applicable modern slavery laws and ethical business practices. Bromcom also intends to adopt a proportionate risk-based approach to supplier management. Where a supplier is considered to present an elevated level of risk, Bromcom may undertake further enquiries, including requesting the completion of a supplier questionnaire, in order to better understand and assess the relevant risks.

Bromcom will continue to review and develop its risk assessment and risk management processes as part of its ongoing commitment to preventing modern slavery within its business and supply chain

9. Actions Taken During the Financial Year

In accordance with section 54 of the Modern Slavery Act 2015, Bromcom has taken a number of steps during the reporting period to strengthen its approach to modern slavery prevention, including:

- adopting and implementing a Modern Slavery Policy;
- introducing a Supplier Code of Conduct;
- reviewing existing employment, whistleblowing and governance policies as part of its wider compliance framework;
- reviewing its approach to modern slavery risk management and identifying areas for future development;
- developing Bromcom's Modern Slavery and Human Trafficking Statement.

10. Effectiveness

Bromcom seeks to evaluate the effectiveness of its approach to preventing modern slavery and human trafficking.

As Bromcom's modern slavery framework continues to develop, the Company intends to review and assess the effectiveness of its policies, procedures and controls on a periodic basis.

Future effectiveness measures may include reviewing the implementation of modern slavery-related policies, monitoring supplier engagement activities, reviewing any concerns raised through internal reporting channels and assessing the adoption of modern slavery controls within relevant business processes.

Bromcom will continue to develop appropriate monitoring and reporting mechanisms as its modern slavery framework matures.

11. Employees and Recruitment

Bromcom seeks to ensure that modern slavery does not occur within its workforce through fair and lawful recruitment, onboarding and employment practices.

Our employment practices include:

- providing employees with written employment terms setting out their contractual rights, remuneration, working hours and other relevant conditions of employment;
- undertaking appropriate right-to-work checks in accordance with applicable legal requirements;
- maintaining payroll processes that support the accurate payment of employees in accordance with their contractual terms and applicable legal requirements;
- operating recruitment and onboarding processes that provide employees with information about their roles, employment terms and relevant workplace policies;
- supporting employees' freedom to work and leave employment in accordance with their contractual terms and applicable legal rights, without coercion or unlawful restrictions; and
- providing established HR, grievance and whistleblowing channels through which employees can raise workplace concerns. Concerns relating to potential exploitation, coercion or modern slavery are escalated and investigated as appropriate.

Human Resources oversees relevant employment practices and reviews policies and procedures as appropriate. Bromcom also has access to specialist advice to support compliance, review existing controls and identify areas for continuous improvement.

12. Training and Awareness

Bromcom promotes awareness of modern slavery and ethical employment practices through a combination of policies, training resources and internal communications.

Employees have access to information regarding expected standards of conduct and reporting routes through the Employee Handbook, Modern Slavery Policy, Whistleblowing Policy and other internal communications. These materials communicate Bromcom's expectations regarding ethical conduct, employee welfare and the reporting of concerns.

Bromcom maintains training resources through its TalentLMS platform, including compliance-related learning materials, assigned training and completion records. Existing training resources support awareness of ethics, compliance, whistleblowing, safeguarding and employee rights.

Human Resources and relevant managers are expected to understand how concerns relating to potential exploitation, coercion or inappropriate employment practices should be recognised, escalated and addressed through established internal procedures.

During the next reporting period, Bromcom intends to review training requirements, identify employee groups for whom additional modern slavery awareness training may be appropriate and, where proportionate, incorporate modern slavery awareness into existing compliance training programmes.

13. Reporting Concerns

Bromcom encourages employees, suppliers, contractors and other stakeholders to raise concerns regarding suspected modern slavery, forced labour or human trafficking.

Concerns may be reported through the disclosure procedure as detailed in the staff handbook under the whistle blowing section.

Bromcom is committed to ensuring that concerns raised in good faith are treated seriously, assessed and investigated by the appropriate internal stakeholders. Individuals raising concerns in good faith are encouraged to do so without fear of retaliation.

14. Future Priorities

During the next reporting period, Bromcom intends to continue strengthening its approach to preventing modern slavery and human trafficking by reviewing training needs, identifying relevant employee groups for further awareness activities and embedding modern slavery considerations within existing compliance processes where appropriate.

Bromcom also intends to continue reviewing and developing its supplier management processes, including considering modern slavery risks when entering into new supplier arrangements and renewing existing supplier contracts.

As part of its ongoing commitment to continuous improvement, Bromcom will continue to review and develop its policies, procedures and governance arrangements, and will consider

the implementation of proportionate due diligence, risk assessment and monitoring measures to support the identification and management of modern slavery risks within its supply chain.