

MODERN SLAVERY POLICY

Organisation

This statement applies to Locale Limited. The information included in the statement refers to the financial year 2026

Definitions

Locale Limited considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

Commitments

Locale Limited acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Locale Limited understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Locale Limited does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Locale Limited in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Locale Limited strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in United Kingdom, South Africa and Portugal. Locale Limited aims to provide working conditions and benefits that meet or exceed applicable legal requirements.

Organisational Structure

Locale Limited is a UK-based business operating within the property technology sector, providing digital platforms and customer engagement services to clients.

Locale Limited forms part of The Avebury Group and operates alongside other group entities, including RealService Ltd. Locale Limited is overseen by a Board of Directors, with day-to-day operations managed by the Executive Leadership Team.

Locale Limited operates primarily within the United Kingdom, with employees working remotely and across client sites. Locale Limited also engages employees and contractors internationally, including in Portugal and South Africa.

The principal activities of Locale Limited include the provision of digital products, customer engagement solutions, and operational support services to clients within the property sector. These services are delivered on an ongoing basis and are not seasonal in nature.

The labour supplied to Locale Limited in pursuance of its operations is primarily carried out in the United Kingdom, with additional support provided by international employees and contractors in Portugal and South Africa.

Supply Chain Structure

In order to fulfil its activities, Locale Limited engages a range of suppliers to support the delivery of its digital platforms and services. These supply chains primarily include software and technology providers, IT infrastructure and hosting services, professional services (including legal, finance, and consultancy), and third-party contractors supporting operational delivery.

Locale Limited's supply chains are predominantly service-based and are largely located within the United Kingdom and Europe. Locale Limited works primarily with established, reputable suppliers and does not operate complex, multi-tiered manufacturing supply chains.

Given the nature of Locale Limited's activities, the risk of modern slavery within its direct supply chains is considered to be low. However, Locale Limited recognises that risks may

still exist within indirect supply chains and remains committed to maintaining appropriate oversight and due diligence.

Locale Limited does not have any collective bargaining agreements in place with trade unions.

Organisational Policies

Locale Limited maintains a range of internal policies and procedures that support its commitment to preventing modern slavery and human trafficking within its operations and supply chains.

These include:

- Anti-Slavery Policy
- Anti-Bribery Policy
- Whistleblowing Policy
- Disciplinary Policy
- Grievance Procedure
- Equal Opportunities Policy
- Personal Harassment Policy
- Sexual Harassment Policy

These policies are communicated to employees via the employee handbook and internal systems. They are reviewed periodically to ensure they remain effective and aligned with legal and regulatory requirements.

Assessing and Managing Risk

Locale Limited considers its main exposure to the risk of modern slavery and human trafficking to be within its extended supply chains, particularly in relation to third-party service providers and contractors.

As a service-based organisation operating primarily within the United Kingdom and Europe, Locale Limited does not engage in manufacturing or operate within industries typically associated with higher risks of modern slavery. However, risks may arise indirectly through the use of external suppliers, particularly where there is reduced visibility over lower-tier supply chains.

In general, Locale Limited considers its exposure to modern slavery and human trafficking to be relatively limited. Nonetheless, Locale Limited has taken steps to ensure that such practices do not take place within its business or, where reasonably practicable, within its supply chains.

Due Diligence in Relation to Modern Slavery

Locale Limited undertakes proportionate due diligence in relation to modern slavery and human trafficking risks within its operations and supply chains.

As part of this approach, Locale Limited:

- Works primarily with established and reputable suppliers, including recognised software and service providers
- Conducts supplier due diligence where appropriate, which may include the use of supplier questionnaires during onboarding
- Maintains a central record of suppliers, including key documentation such as privacy policies and terms of business
- Considers modern slavery risks as part of its supplier selection and onboarding processes
- Ensures employees are aware of modern slavery risks through internal policies and training
- Provides clear reporting channels, including a whistleblowing process, for raising concerns

Locale Limited does not operate within high-risk industries and does not maintain complex, multi-tiered supply chains. As such, its due diligence approach is designed to be proportionate to the level of risk identified.

Locale Limited remains committed to reviewing and strengthening its approach to due diligence as the business grows and its supply chains evolve.

Training

Locale Limited provides training to employees to ensure awareness of modern slavery and human trafficking risks, and to support the effective implementation of its policies and procedures.

All employees are required to complete modern slavery awareness training as part of their induction. This training provides an overview of modern slavery, identifies potential risk indicators, and outlines the steps employees should take if concerns arise.

In addition, employees are required to complete periodic refresher training to maintain awareness and ensure continued understanding of their responsibilities. This training is delivered via Locale Limited's internal learning platform.

Monitoring and Evaluation

Locale Limited monitors the effectiveness of its approach to preventing modern slavery and human trafficking through a number of key indicators.

These include:

- Completion rates of modern slavery training by employees
- Awareness and use of internal reporting channels, including whistleblowing procedures
- Ongoing review and maintenance of supplier records and documentation
- Use of supplier due diligence processes, including questionnaires where appropriate
- Periodic review of internal policies to ensure they remain effective and up to date

Locale Limited will continue to review and develop its approach to monitoring and evaluation as the business grows and its operations evolve.

Steps

Locale Limited has not, to its knowledge, conducted business with any organisation that has been found to have engaged in modern slavery or human trafficking.

In accordance with section 54(4) of the Modern Slavery Act 2015, Locale Limited has taken the following steps to ensure that modern slavery is not taking place within its business or supply chains:

- Implemented internal policies supporting ethical conduct, including an Anti-Slavery Policy and Whistleblowing Policy

- Established clear reporting channels for employees to raise concerns, including a dedicated reporting email address
- Introduced modern slavery awareness training for employees, including induction and refresher training
- Undertaken proportionate due diligence on suppliers, including the use of supplier questionnaires where appropriate
- Maintained a central record of suppliers and relevant documentation
- Considered modern slavery risks as part of supplier selection and onboarding processes

Locale Limited remains committed to continuously improving its approach to identifying, assessing, and mitigating the risks of modern slavery within its operations and supply chains.

Modern Slavery Compliance Officer

Locale Limited has appointed a Modern Slavery Compliance Officer, who is responsible for overseeing Locale Limited's approach to preventing modern slavery and human trafficking. All concerns regarding modern slavery should be reported via Locale Limited's established reporting channels, and will be reviewed and addressed as appropriate.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed annually.

Date of approval by the Board of Directors: 02/04/2026

Signed:



Name:

Guy Windsor-Lewis

Position:

Date:

05/04/2026







2026-04-02 MODERN SLAVERY POLICY

Final Audit Report

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