



Modern Slavery Statement

Year ended 31 March 2024

The iomart Group takes all possible steps to combat and prevent slavery and human trafficking. This statement covers the following companies of the iomart Group:

- iomart Group plc;
- iomart Managed Services Limited; and
- EasySpace Limited

(which are collectively referred to as “iomart” in this statement).

iomart takes its responsibility in this area very seriously and has implemented robust controls and checks, including continual monitoring, with a view to improving our processes and performance to eliminate any possible complicity in human rights violations. We fulfil this commitment through the operation of our corporate governance processes and ISO-certified business procedures.

iomart has consolidated revenue of over £120 million.

This statement has been published in accordance with section 54(1) of the Modern Slavery Act of 2015 and reflects iomart’s commitment and efforts to operate responsibly for the financial year ending 31 March 2024: including protecting the human rights of all who work directly and indirectly for iomart.

Business Overview

Predominately recognised as a leading provider of managed cloud compute services across industry sectors, our business has over 450 employees and thousands of customers. iomart provides end-to-end business hosting solutions maintained by our UK-based 24/7 support service, delivering managed cloud products and services from our own data centres and high-speed dark fibre network in the United Kingdom, with associated global suppliers and third-party cloud providers.

While heavily centred in the United Kingdom, iomart operates across multiple geographies, including the United States, Republic of Ireland, France, Poland, Denmark, Norway, the Netherlands, Germany, Austria, Dubai, Singapore, Indonesia, Japan and Brazil.

Tackling Modern Slavery

iomart is committed to ensuring that there is no modern slavery or human trafficking in its supply chain or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery, and human trafficking is not taking place anywhere in our supply chain.

People

iomart ensures that only those who choose to work freely are employed within our business.

iomart has robust recruitment practices in place to ensure compliance with legal regulatory requirements, including those related to slavery and human trafficking. Appropriate background checks are completed in respect of prospective employees, including confirmation that prospective employees have the right to work and remain in the UK. Employees are paid fairly, with salaries paid directly into their own bank accounts.

An individual's human rights are important to iomart and therefore, we do not accept any form of discrimination, harassment or bullying. iomart employees are able to raise any concerns or complaints freely and have access to the Whistleblowing Policy via the Company intranet.

Supply Chain Conformance

iomart's supply chain consists of various cloud service products, in addition to energy and other IT infrastructure suppliers. We have zero tolerance to modern slavery and human trafficking. To ensure that all those in our supply chain comply with our values we monitor and enforce compliance with those values in a number of ways:

Identifying Risk

- We conduct internal risk and material assessments to identify potential categories, countries, products or other areas that receive additional scrutiny for risks, including Slavery and Human Trafficking.
- Suppliers undergo a due diligence process prior to product or service provision to ensure they have policies in place to address human rights in the workplace, with annual monitoring in place to check Corporate Social

Responsibility (CSR) reporting. The depth of due diligence varies based on factors such as the category and country of origin of the supplier, products, and services. This due diligence involves senior and executive management responsible for CSR, who evaluate proposed products, services, or suppliers.

Managing Risk

- Where a supplier is at risk for human trafficking, they must demonstrate awareness, policy and measures for driving it out of their business before they are allowed to provide the product or service. Performance monitoring and reviews check their adherence.
- Where applicable, iomart may use Vendor Partnership Programmes. This involves working either directly with the vendor or with their defined distribution channel (by making use of approved resellers). Vendor Partnership Programme benefits typically include:
 - Procurement through recognised channels in compliance with vendor, and;
 - the businesses which are part of the programme issue defined statements and assurance with respect to their compliance with the Modern Slavery Act 2015.
- We recognise that where individuals are employed through our business partners, we are not directly responsible for the employee relationship or how they manage their employees. To mitigate the risk, we demand certain contractual standards including an undertaking that the supplier complies with the Modern Slavery Act 2015.

Raising Awareness

iomart complies with a comprehensive set of employment and personnel-based policies and procedures, as well as all relevant employment legislation covering the Modern Slavery Act 2015.

All employees are made aware of their responsibility to comply with formal policies and procedures, and regular training is provided to reinforce this message. Employees also receive awareness training on purchasing and supplier management where relevant to their role. From this training, our employees can gain a better understanding of the nature of any risks we may face as an organisation and implement supportive actions where necessary.

iomart encourages all of its employees and contractors to report any concerns they may have about slavery or human trafficking within its supply chain, even if

they turn out to be unfounded. iomart will continue to monitor its supply chain and will reassess policies annually to ensure that it is continuing to meet its organisational values.

Approval for this Statement

This statement has been approved by the Board of iomart Group PLC who will review it annually. This statement has been made available on our website.

Lucy Dimes

Chief Executive Officer

30th April 2024