

2026 STATEMENT

Arqiva Group Modern Slavery Statement

JUNE 2026

OVERARCHING STATEMENT

Arqiva Group Limited and its subsidiaries including its primary trading entities Arqiva Limited, Arqiva Muxco Limited and Arqiva Smart Metering Limited (“Arqiva”) are opposed to all forms of modern slavery, child labour and human trafficking. We are committed to identifying, addressing and preventing modern slavery, child labour and human trafficking in our operations and supply chains.

This statement sets out the steps taken in the financial year ending 30 June 2026 to prevent modern slavery and human trafficking in accordance with the Modern Slavery Act 2015.

We recognise that modern slavery risks exist in all sectors and geographies and that ongoing vigilance, transparency and continuous improvement are required to manage these risks effectively.

ORGANISATION, BUSINESS AND SUPPLY CHAIN

Arqiva is a communications infrastructure and services provider with over 1100 employees operating primarily in the UK and Europe within the Media and Broadcast and Smart Utilities sectors.

Arqiva buys a wide range of goods and services, from network and IT hardware, software and support, transmission services, satellite capacity, devices, construction services to corporate related services including facilities related services, recruitment, professional support, vehicles and corporate clothing. We use some of these products and services in our own business (e.g. those needed to keep our facilities and corporate systems running) and we use some of these as part of what we sell to our customers (e.g. meters and communications devices for our Utilities customers).

Arqiva consciously limits the number of active suppliers that it trades with in order to allow for more comprehensive and effective supplier monitoring and management. As at 30 June 2026, Arqiva had c.823 active suppliers in 26 countries, and during FY26 traded with 625 of those suppliers across 22 countries with 81% of overall spend across the top 25 suppliers. Almost all spend in this period has been with suppliers based in the UK and Europe with only c.1% spend with suppliers in the USA and Asia Pacific.

Arqiva’s visibility and oversight are strongest at tier 1 (direct) supplier level. We recognise that visibility further down the supply chain (tier 2 and beyond) is more limited, particularly in categories involving construction, and outsourced services.

We assess that inherent modern slavery risk within our direct supply base is relatively low due to geographic concentration and nature of services, but we continue to monitor for emerging risks and indirect exposure.

ARQIVA’S POLICIES AND APPROACH

Doing business the right way is vital to Arqiva and its ethics and values are integrated within all levels of its operations, including promoting and upholding policies and practices that support the prevention of modern slavery and human trafficking. Arqiva joined the UN Global Compact in 2026 and maintains a framework of policies and controls to mitigate modern slavery risk, including: an Internal Code of Conduct; a Supplier Code of Conduct; an Anti-Bribery and Corruption Policy; an Equality, Diversity and Inclusion Policy; and a Speak Up (Whistleblowing) Policy.

Transparent and responsible business practices are expected at all levels of Arqiva's supply chain to enable delivery of Arqiva services in an ethical, accountable, safe and sustainable way. To support this, all suppliers are required to comply with the Arqiva Supplier Code of Conduct or equivalent standards.

GOVERNANCE AND OVERSIGHT

Overall accountability for this statement and for ensuring that there are appropriate controls in place to prevent modern slavery and human trafficking within Arqiva and through its supply chain sits with the Board of Directors.

Arqiva encourages the reporting of any concerns that colleagues or external third parties may have (including any suspected non-compliance with policies) and provides various channels to raise concerns, including an independently managed phone and online reporting service. The independent Speak Up (whistleblowing) mechanism is available to employees and external stakeholders and is overseen by Internal Audit. The Audit & Risk Board Committee has oversight of whistleblowing and would be alerted of any modern slavery or human trafficking issues in the supply chain and any actions taken to resolve them.

Operational responsibility for the management of the modern slavery risk within our supplier relationships sits with the Director of Procurement, reporting to the Chief Financial Officer. The Chief Legal Officer is also involved in escalation of any material issues.

Arqiva's Supplier Code of Conduct requires Suppliers to implement their own robust whistleblowing practices throughout their supply chain and report any breaches of the Arqiva Supplier Code of Conduct, either directly or through Arqiva's independently and confidentially managed reporting service.

Where concerns relating to modern slavery are identified, Arqiva is committed to taking a proportionate and risk-based response, including prompt investigation of reported concerns; engagement with suppliers to understand root causes; implementation of corrective action plans where appropriate; and escalation to senior management and Legal as required. Arqiva recognises the importance of a victim/human-centric approach and that immediate termination may not always be the most effective response. Where appropriate, Arqiva may seek to work with suppliers to drive remediation and improved practices, provided there is willingness and capability to improve.

DUE DILIGENCE AND RISK MANAGEMENT IN THE SUPPLY CHAIN

Arqiva's due diligence process operates across the full supplier lifecycle (including pre-screening, onboarding, contracting and ongoing monitoring):

- **Pre-screening and Onboarding:** initial screening using risk tools and questionnaires. This screening approach includes flags for media reports, investigations, findings and judgments associated with the Supplier which supports identification of potential modern slavery indicators. These flags trigger review and escalation. Where identified risks are deemed to be unacceptable, the proposed supplier will fail initial screening and will not proceed any further in Arqiva's onboarding process.
- **Contracting:** inclusion of contractual obligations requiring compliance with modern slavery laws and Arqiva policies including the Supplier Code of Conduct available at www.arqiva.com (or approved Supplier equivalent policies).
- **Ongoing monitoring and supplier engagement:** use of risk tools on an ongoing monitoring basis and review of real-time supplier risk alerts (as generated by the risk tools) and ongoing policy and process discussions with suppliers (particularly around operational and commercial activities).
- **Enhanced review and escalation:** risks escalated to Procurement leadership and Legal where appropriate.

Where potential risk indicators are identified, Arqiva undertakes further investigation and validation before determining appropriate action.

TRAINING AND AWARENESS

All employees are required to complete annual mandatory training on the Code of Conduct and ethical business practices including modern slavery and human trafficking prevention. Targeted awareness is provided to relevant functions including procurement and supplier-facing teams to support identification of risks in practice.

EFFECTIVENESS, KPIs AND CONTINUOUS IMPROVEMENT

Arqiva is committed to continuous improvement in its approach to managing modern slavery risk and is in the process of enhancing its approach to measuring effectiveness and performance in managing modern slavery risk. We expect that improvements in supply chain transparency and risk assessment will continue to evolve over time.

During the financial year ending 30 June 2026, Supplier onboarding and monitoring processes were reviewed and enhanced and Supplier risk analytics tools have been embedded across all procurement processes. The following KPIs applied:

- 100% of active suppliers were screened using the risk analysis tool. No high-risk suppliers were identified.
- There were 0 reports of child, forced, or compulsory labour issues within our operations
- 100% of employees completed mandatory training including training on preventing modern slavery, child labour and human trafficking

Metrics will continue to be kept under review for future statements. KPI and effectiveness development for FY27 includes targeted supplier ESG questionnaires to be completed by the top 25 suppliers (c.80% spend in FY26). This includes 4 suppliers who operate in medium to high risk categories (e.g. construction and outsourced services). The questionnaire will cover modern slavery supply chain management practices including tier 2 and beyond.

STATEMENT

This statement describes the activities that the Arqiva Group has undertaken in the financial year ending 30 June 2026 to prevent modern slavery in its business operations and supply chain. The Boards of Directors of Arqiva Group Limited, Arqiva Limited, Arqiva Muxco Limited and Arqiva Smart Metering Limited have approved the statement and have delegated authority to Shuja Khan to sign the statement.

Signed:


Shuja Khan (Jul 1, 2026 09:05:14 GMT+1)

Shuja Khan

Chief Executive Officer

Date: **01/07/2026**