



XMA Holdings Ltd : Anti-Slavery Statement for year ended 31 December 2025

1: Introduction

XMA Holdings Ltd (“XHL”) is committed to preventing acts of Modern Slavery and Human Trafficking from occurring within its group business and supply chain and imposes the same high standards on its suppliers. XHL provides this public statement on behalf of the XMA Group (as defined below) in accordance with section 54 of the Modern Slavery Act 2015 (“MSA”).

During 2025, XMA Limited (“XMA”) continued to prioritise our approach to ethical processes and partnering responsibly to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. XMA is committed to improving our practices to combat slavery and human trafficking in our business and supply chain.

“The XMA Group takes its Anti-slavery and Human Trafficking requirements extremely seriously and is wholly committed to eliminating such practices from our supply chain.

We are continuously improving our operations to ensure full compliance with our legal and social responsibility. As the Group grows, Corporate Governance remains key to the successful expansion of the business”

Kelvin Lee - Chief Executive Officer.

2: Structure of the organisation

XHL is the parent management company to the XMA Group of companies. XHL is a company incorporated in England and Wales (registered number 13166183) and its registered office is at Wilford Industrial Estate Ruddington lane Wilford Nottingham NG11 7EP.

3: Business of XHL and its supply chains

XHL is solely a management company and does not actively trade. XHL does not therefore have its own website. XMA is an active trading company of XHL. As at 31 December 2025, the XMA Group employed 605 people across business operations in the UK. XMA is a value added reseller of IT products and services working with a range of suppliers, almost all of which are global manufacturers such as HP, Apple, Dell and Lenovo and leading vendors and system integrators (SIs) to deliver agile and flexible solutions, supported by best-in-class technologies. Within the UK, XMA is one of the top twelve largest resellers of IT products and services. XMA’s registered and head office is at Wilford Industrial Estate, Ruddington Lane Wilford, Nottingham, Notts, NG11 7EP Nottingham. (Website <https://www.xma.co.uk/>).

A copy of this statement will be placed on all company websites in the XMA Group.

4: XMA Policy on slavery and human trafficking

Slavery and human trafficking are illegal and a violation of human rights. There are many forms of modern slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain. XMA has a zero tolerance approach to modern slavery and human trafficking; we are committed to acting ethically, and with integrity and have appropriate policies in place that reflect our commitment to acting with integrity in all our business relationships.

XMA expects suppliers and other business partners to uphold high standards in their business practices.

0115 846 4000

www.xma.co.uk | enquiries@xma.co.uk

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5: Practices of XMA

As part of XMA's commitment to combating modern slavery, we have the following practices:

- We produce a Supplier Code of Conduct (the "Code") https://www.xma.co.uk/wp-content/uploads/2026/05/XMA_SupplierCodeofConduct.pdf which includes provisions on slavery and human trafficking and ensure all of our suppliers adhere to the principles of this Code as a minimum standard. The Code is also available on all company websites under the XMA Group.
- Our standard supplier agreement (which we ask new partners to sign) contains specific anti-slavery provisions and confirms adherence to our Code.
- XMA's standard terms of purchase <https://www.xma.co.uk/wp-content/uploads/2024/11/MSD-PRC-D001.pdf> refer to suppliers adhering to the MSA.
- If suppliers insist on us trading on their terms, we ensure we insert a clause noting they must adhere to the principles of our Code and specific provisions relating to MSA compliance.
- We ensure our suppliers are aware of our practices and policies and adhere to the same high standards.
- We annually submit our Statement to the Transparency in Supply Chains ('TISC') Report, an open data modern slavery statement register to support the UK in fighting modern slavery.

6: Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains.

To adhere to the Responsible Sourcing Tool (RST) framework we internally map and monitor our supply chain through specialised software tools to identify which suppliers demonstrate the highest potential risk of slavery and human trafficking. All suppliers maintain active profiles with minimum annual updates and requests for clarification where indicative scoring indicates noncompliance to any information requested. We place our supply chain into tiers with those that have a changeable workforce/country of manufacture representing the highest risk subject to a higher frequency of review/audit and direct Board sponsorship.

- monitor potential risk areas in our business and supply chains.

Through appropriate safeguarding plans and processes, with regular monitoring of relevant/vulnerable groups to reduce the risk of slavery and human trafficking occurring in our business. This includes a multi stakeholder approach that aligns with RST and international standards for ESG under UN Guiding Principles on Business and Human Rights.

- mitigate our potential for risk.

Our code sets out that both ourselves and our supply chain must categorically not employ child workers. Our internal recruitment policy is based on procedures that focus on compliance with all applicable legislation ensuring the right to work, validity of documents and work permits for foreign workers. Our recruitment process outsourcing (RPO) is centralised and governed through our HR team who work to our standard process of ensuring that all legislation is adhered to.

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- provide adequate protection for whistle-blowers.

We have policies and procedures in place to enable our employees to whistle blow and have safeguards in place should the need arise for them to do so. XMA operate the mechanism contained in our Whistleblowing Policy of:

- (i) an employee reporting in confidence to their immediate supervisor or if that is not possible to do so, to report to Ann O'Shaughnessy, (the "Whistleblowing Officer");
- (ii) the Whistleblowing Reporting Form available on the Company intranet which can be emailed directly to the Whistleblowing Officer or posted anonymously;
- (iii) the ability for anybody to make an anonymous report in writing posted to the Whistleblowing Officer; and
- (iv) providing adequate protection for whistle-blowers on all matters including reporting cases of coercion or forced labour, through our 'Whistleblowing Officer'. Any report submitted via whatever method will always be handled promptly and confidentially.

7: Risk and compliance

XMA has for several years held regular compliance meetings with senior stakeholders to discuss any new legislation, horizon scanning, concerns and best practice. Our Modern Slavery Statements and best practice remain on the agenda. Attendance at these meetings require a senior representative from each department to ensure a unified approach and to learn from the wider experience of Departments in XMA.

We regularly evaluate through our supplier platform the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain by monitoring any anti-slavery policy changes to high value suppliers to ensure any changes are assessed for potential risk or compliance failure.

We do not consider that XMA directly operates in high-risk sectors or locations as most slavery and trafficking occurs within clothing and fashion (ready-made garments) and agricultural products or source raw materials from countries with high modern slavery risk.

Where we have identified a potential risk, these can be investigated adopting Human Rights Due Diligence framework approaches to access actual and potential risks, identify responsibilities, remediate and mitigate through activities such as improved procurement practices or industry collaboration and monitor, and review and report on improvements.

We ensure all our suppliers adhere to the principles of our Code. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains.

We elect department representatives who demonstrate our approach to identifying and eradicating modern slavery within our business in the processes that we take and our risk-based approach to both internal and external contextual factors.

These include:

1. Our Compliance team assesses the risk levels of modern slavery occurring in our chosen partner sector/country supply chain for every Partner annually.
2. Our Compliance Manager conducts audits on whether our partners have poor working practices.
3. Our commercial teams investigate the type of workforce our partners employ and have in place an onboarding process that includes the flow down of ours and our end users' terms.
4. A review of our response procedure in a risk event that includes proactive remediation and improvement.
4. Our HR Department reviews and analyses headcount, monitoring the type of workforce we are employing and what our policy is on temporary workers.
5. Our CPO reviews the pay scales we employ.

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6. Our HR, Compliance and Training Departments manage the equality processes we have in place.
7. Our HR department sets out stringent guidelines for any unpaid roles limited to pre agreed, short term work experience for individuals aged 17 and under recommendation via a school and/or college only.

8: Training and Further Actions

XMA has established a high level training program focused on the MSA, developed for inclusion within our Learning Management System KnowBe4, which was made compulsory for all current employees and permanently accessible by any employees for ongoing training.

We continue to review and improve on existing measures and take additional steps to combat slavery and educate our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. We encourage employees to identify and report potential breaches. Our Learning Management System provides an audit of all staff that have completed the training and flags those that are overdue for management to enforce completion.

9: Sign-off

This statement is made in accordance with section 54(1) of the MSA and constitutes XHL's Anti-Slavery and Human Trafficking statement for the financial year ending 31 December 2025.

XMA Executive Board have approved this statement with final approval from the XHL Board on 19th May 2026.

Signed by

Signed by:

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Kelvin Lee
Chief Operating Officer for and on behalf of XHL and XMA Ltd

Date: 22/5/2026 | 09:33:33 PDT

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