

Modern Slavery & Human Trafficking Statement

LURI GROUP | FINANCIAL YEAR ENDED 28 FEBRUARY 2026

1 Introduction and commitment

LURI Ltd and the businesses identified in this statement (together, the “Group”) are committed to preventing modern slavery, forced or compulsory labour, servitude and human trafficking in their own operations and supply chains. We expect our employees, suppliers and business partners to act lawfully and with respect for human rights.

This statement describes the steps taken during the financial year ended 28 February 2026. It is prepared with reference to section 54 of the Modern Slavery Act 2015. The Group has elected to publish one statement covering the businesses below, irrespective of whether each business independently meets the statutory turnover threshold.

2 Group structure and activities

The statement covers the following businesses within the LURI Group structure, as identified by the Group:

- LURI Ltd
- Greentech Distribution PLC
- Greentech Gaming Limited
- Greentech Solutions Services Limited (part of Greentech Distribution PLC)
- Avinity Ltd
- KTM Online Limited
- KTM Device Protection Services
- Go Mobile Limited
- Go Mobile Retail Limited
- Fonehouse Services Limited
- Lavricks Limited
- Lavricks Property Holdings Limited
- RP Europe Solutions Limited

The Group operates internationally across all continents, with activities in consumer technology products, connected devices, fast-moving consumer goods (FMCG), mobile connectivity, insurance, corporate gifting and rewards, and gaming. Its supply chains encompass suppliers of products and services, manufacturers, distributors, logistics and other commercial service providers, according to the needs of individual businesses.

3 Policies and governance

The Group maintains policies and procedures addressing legal compliance, ethical conduct and reporting of concerns. Relevant policies are incorporated in the employee handbook and are available to staff through the company intranet and HR software. Relevant employees are taken through updated documents and procedures and informed of material legislative and compliance developments.

Responsibility for maintaining appropriate processes sits with Group and business management. Adherence to relevant compliance requirements is tracked through the annual audit process. The Group expects concerns relating to potential exploitation to be raised promptly through established management or internal reporting channels.

4 Supplier due diligence and onboarding

Supplier vetting is undertaken across the Group as part of the onboarding process. Supporting documentation is recorded and filed. These procedures are intended to support informed supplier selection, traceability of assurance information and appropriate review of commercial relationships.

Where relevant to the nature and risk of a supplier relationship, the Group may seek further assurances, review supporting information, make enquiries or take appropriate follow-up action. Suppliers are expected to comply with applicable laws, including legislation addressing modern slavery and human trafficking.

5 Risk awareness and assessment

The Group recognises that international sourcing and the sectors in which it operates may expose supply chains to modern slavery risks, even where no specific case has been identified. Potential risk factors include country of origin, lower-tier sourcing, recruitment and labour practices, subcontracting and labour-intensive manufacturing or logistics.

No specific incidents or findings of modern slavery or human trafficking were identified or reported to the Group during the financial year ended 28 February 2026. This does not amount to a guarantee that no such conduct exists anywhere in the supply chain. The Group continues to manage potential exposure through supplier onboarding, documentary controls, policy communication and its annual compliance audit process.

6 Employee awareness and training

Relevant staff are informed of updated documents, processes and legislative developments as part of the Group's ongoing compliance arrangements. Employee awareness and adherence to relevant requirements are assessed through the annual audit process. Training and communications are adapted to job responsibilities and business needs; the Group does not present this activity as a separately measured formal training programme.

7 Reporting, concerns and response

Employees and business partners are encouraged to report any suspicion of slavery, trafficking, forced labour or other exploitation. Any concern brought to the Group's attention would be escalated for appropriate review. Depending on the circumstances, action may include further fact-finding, obtaining specialist advice, engaging with an affected supplier, alerting relevant authorities where appropriate, and taking proportionate corrective action with regard to the welfare of affected people.

The Group recognises that an immediate termination of a commercial relationship may not always be the most appropriate response where vulnerable workers could be adversely affected. No modern slavery or human trafficking incidents were identified or reported during this reporting period.

8 Monitoring effectiveness

The Group considers the operation of its existing controls through four qualitative indicators:

Area	Approach during the reporting period
Supplier onboarding	Supplier vetting undertaken on onboarding; supporting records retained.
Employee awareness	Updated compliance documents and processes communicated to relevant staff.
Policy accessibility	Employee handbook and relevant policies accessible via intranet / HR software.
Audit and incidents	Compliance reviewed through annual audit process; no modern slavery or trafficking incidents identified or reported.

The Group will continue to review whether additional monitoring information would be useful and proportionate to its activities and supply-chain risk profile.

9 Continued improvement

The Group intends to maintain and improve its proportionate approach by continuing supplier onboarding due diligence and recordkeeping, keeping policies and guidance accessible and current, communicating relevant updates to staff, reviewing compliance through the annual audit process, and responding appropriately to any concerns that arise.

10 Approval and signature

This is a joint Group statement intended to be considered and approved by the boards of the relevant legal entities before it is published. Approval by each relevant board will be recorded in its board minutes or other appropriate records.

Signed for and on behalf of the LURI Group:

A handwritten signature in black ink, appearing to be 'Richard Crawley', written over a light blue horizontal line.

Richard Crawley
Chairman, LURI Group

Date: 1st March 2026