

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT 2026-2027

This statement sets out the steps that Pinewood Technologies Group PLC and its subsidiaries (“Pinewood”) have taken to prevent modern slavery and human trafficking occurring within any part of its businesses or supply chain during the financial year ending 31 December 2025.

Pinewood recognises its responsibility to lead in corporate transparency. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

OUR STRUCTURE, BUSINESS AND SUPPLY CHAINS

Pinewood Technologies Group PLC is a leading pure-play SaaS (Software as a Service) provider specializing in cloud-native retail solutions for the global automotive industry. Following the successful disposal of our motor retail and leasing businesses in 2024, our operations are now exclusively focused on technology and software development.

The Group is headquartered at 2960 Trident Court, Solihull Parkway, Birmingham, and currently employs approximately 296 Associates. Our supply chain primarily consists of technology partners (such as Microsoft Azure), hardware manufacturers, and professional service providers.

OUR ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

The Board annually reviews and approves the Group's Anti-Slavery and Human Trafficking Policy.

Our Anti-Slavery Value: We operate with a zero-tolerance attitude to the exploitation of individuals in any form. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

Our full Policy is accessible to all staff via our internal portal and is available for external stakeholders on our website at pinewood.ai.

OUR DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

In accordance with our Policy, we continue to conduct risk assessments with internal audit to identify which parts of our businesses are most at risk from modern slavery. We actively engage with all our major suppliers to convey our Policy and the Pinewood Anti-Slavery Value, requiring confirmation that they have read, understood, and will adhere to these standards. This process includes conducting surveys of our suppliers to establish the specific steps, measures, and practices they have implemented to prevent modern slavery within their own organisations.

Furthermore, we conduct supplier pre-screening where appropriate in our contract and tender processes and include specific modern slavery prohibited act provisions in our supply contracts. The responses and reactions of our suppliers to these due diligence steps are reviewed regularly, allowing us to refine and modify our approach to ensure it remains appropriate. While the directors believe that Pinewood companies are generally at low risk of exposure, our internal risk assessments identify which suppliers or sub-contractors are potentially more exposed than others to ensure further diligence is applied.

MEASURING THE EFFECTIVENESS OF THE POLICY

The Pinewood anti-slavery value statement makes it clear that our attitude to modern slavery is zero tolerance. To this extent, we have not adopted generic performance indicators, as any instance of modern slavery or human trafficking by a supplier would be considered a fundamental breach of Policy. However, through our survey of key suppliers, we formally record how many of our partners have agreed to adhere to our Policy and how many have implemented their own contractual arrangements prohibiting forced or trafficked labour.

We also monitor how many suppliers place obligations on their own employees to familiarise themselves with anti-slavery policies and how many conduct their own risk assessments. Where a supplier indicates they are not yet in a position to provide positive affirmation, we require a clear timescale for compliance. We continue to re-survey and reassess our key suppliers on a bi-annual basis to ensure sustained adherence to the Modern Slavery Act 2015.

TRAINING AND AWARENESS OF OUR ASSOCIATES

All Pinewood Associates have an obligation to familiarise themselves with our Policy and procedures to help in the identification and prevention of modern slavery. Adherence to our Policy forms part of all Associates' obligations under their contract of employment. To further raise awareness internally, the Policy is published

on our internal intranet portal, accompanied by a short awareness film designed specifically for our industry. In addition, all new Associates are introduced to the Policy as a mandatory part of their induction process to ensure our zero-tolerance culture is understood from the outset of their career with Pinewood.

BOARD APPROVAL AND SIGN-OFF

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2025.

This statement was formally approved by the Board of Directors of Pinewood Technologies Group PLC on 15 April 2026.