



Modern Slavery Statement

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour, and human trafficking, all of which deprive individuals of their liberty for personal or commercial gain.

This statement constitutes our human trafficking and modern slavery transparency statement pursuant to section 54(1) of the UK Modern Slavery Act 2015 for the financial year ending 30 June 2026 and reflects our commitment to acting ethically and with integrity in all our business relationships.

This statement applies to the following companies:

- Bright SG Ltd (Reg. in Ireland: 186005)
- Bright Software Group Ltd (Reg. in England & Wales: 14811663)
- Bright SG Ltd (Reg. in England & Wales: 04664435)
- Surf Accounts Ltd (Reg. in Ireland: 328091)
- Relate Software Development Ltd (Reg. in Ireland: 315134)
- Relate Infotech Private Ltd (Reg. in India)
- Ardbrook Ltd (Reg. in Ireland: 120141)
- Accountancy Manager (AM) Ltd (Reg. in England & Wales: 10658933)
- BTC Software Ltd (Reg. in England & Wales: 04539303)
- Brightpay Ltd (Reg. in Ireland: 632016)
- Bright HR Ltd (Reg. in Ireland 500852)
- TSL Investment Holdings Ltd (Reg. in Ireland: 551689)
- Irish Payroll Association Ltd (Reg. in Ireland: 327011)
- Myworkpapers Group Limited (Reg. in England & Wales: 12062592)
- Myworkpapers Ltd (Reg. in England & Wales: 08631892)
- Myworkpapers Australia Pty Ltd (Reg. in Australia:136582888)
- The Learn Centre Limited (Reg. in England & Wales: 03652566)
- ArtificialDev Limited (Reg. in Northern Ireland: NI647093)
- Inform Direct Limited (Reg. in England & Wales: 07887285)
- Anglia Registrars Ltd Limited (Reg. in England & Wales: 08123856)

(collectively referred to as "**the Group**").

Business Overview

The Group is a Software-as-a-Service (SaaS) provider operating in the UK and Ireland. We are committed to conducting our business fairly, ethically, and with respect for fundamental human rights. We have zero tolerance for modern slavery and human trafficking in any form within our business operations and supply chains.

Our Commitment

We are committed to:

- Identifying and addressing risks of modern slavery in our operations and supply chains
- Ensuring transparency in our approach to tackling modern slavery
- Implementing effective systems and controls to prevent modern slavery
- Expecting the same high standards from our suppliers and partners

Our Policies

We have implemented policies and procedures to mitigate the risk of modern slavery within our business and supply chains:

- **Employment Practices:** We provide all employees with formal employment contracts and pay at or above legally required levels. We comply with all legal obligations regarding working hours, rest breaks, and holidays.
- **Whistleblowing Policy:** We encourage reporting of concerns and protect those who raise issues in good faith.
- **Anti-Bribery and Corruption Policy:** We maintain high ethical standards in all business dealings.
- **Equality, Diversity, and Inclusion Policy:** We promote fair treatment and respect for all individuals.
- **Supplier Code of Conduct:** We expect suppliers to comply with all applicable laws and regulations, including those related to modern slavery.
- **Recruitment Policy:** We ensure fair recruitment practices.

Due Diligence Processes

To identify and mitigate risks of modern slavery:

- **Risk Assessment:** We conduct regular risk assessments of our supply chains, focusing on high-risk industries and geographic locations.
- **Supplier Screening:** We evaluate potential suppliers before engagement and include modern slavery considerations in our selection criteria.
- **Contractual Requirements:** Our supplier contracts include provisions requiring compliance with modern slavery legislation.
- **Monitoring and Auditing:** We conduct appropriate monitoring and, where appropriate, audits of suppliers identified as higher risk.

Training and Awareness

We provide appropriate training to staff to ensure they understand the risks of modern slavery and human trafficking and can identify potential issues. Our training program includes:

- Awareness of modern slavery and its various forms
- Recognition of warning signs
- Reporting procedures for suspected cases
- Understanding of relevant legislation

Measuring Effectiveness

We assess the effectiveness of our approach through:

- Regular internal reviews of our policies and procedures
- Monitoring of supplier compliance and enhanced due diligence for suppliers that fall within industries and/or countries that can carry higher risk in respect of modern slavery and human trafficking
- Investigation of any reported concerns or incidents
- Annual review of this modern slavery statement

Reporting Suspicions

Any employee, contractor, or other party who suspects instances of modern slavery or human trafficking within our business or supply chains should immediately report their concerns to their manager, our Legal Counsel, or via our confidential whistleblowing mechanism.

Individuals who raise genuine concerns in good faith will not suffer any detrimental treatment as a result of reporting their suspicions, even if they are later found to be mistaken.

Supplier Due Diligence

While we recognize that many of our suppliers operate in low-risk industries and jurisdictions, we remain vigilant. We will:

- Identify high-risk suppliers based on industry and location
- Require higher-risk suppliers to complete self-assessment questionnaires
- Conduct additional due diligence where appropriate
- Terminate relationships with suppliers found to be engaging in or knowingly tolerating modern slavery in their operations or supply chains

Performance Measures

This year, our main activities in relation to our supply chain were largely in line with our commitments last year and involved:

- Engaging with suppliers at the point of onboarding/contract renewal to ensure that appropriate terms are in place to cover compliance with all applicable modern slavery, anti-human trafficking and labour laws. We continue to request that new and existing suppliers sign up to our Supplier Code of Conduct or have in place their own materially equivalent code that mirrors the same minimum level of compliance
- We have reviewed our supplier onboarding and management processes
- Continued our annual training programme focusing on raising awareness around sustainable procurement practices which are also in line with our compliance responsibilities and reiterating our zero-tolerance approach to modern slavery

Future Commitments

Over the next reporting period, in order to further reduce the risk of modern slavery and human trafficking in our supply chain, we are committed to:

- Building on our training programme focusing on raising awareness around sustainable procurement practices, with an emphasis on the importance of escalating any concerns around modern slavery for further investigation
- Using the above-mentioned risk-based supplier assessment framework to conduct targeted audits of higher-risk suppliers to ensure ongoing compliance with our Supplier Code of Conduct

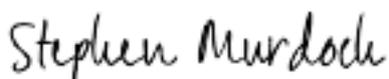
Governance

For questions about this statement or to report concerns related to modern slavery, please contact:

Maria Hickey
Senior Legal Counsel
Legal@brightsg.com

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of Directors.

Signed:



Stephen Murdoch

Director / CEO

23 September 2025

This statement will be reviewed annually and updated as necessary. It is published on our website and will remain accessible for the duration required by law.