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Innovo Holding Limited

Modern Slavery Statement

September 2026

This statement has been published in accordance with the Modern Slavery Act 2015 of UK Public General Acts for the financial year ending 31 December 2025.

The definitions

We consider the definitions of modern slavery as servitude, forced or compulsory labour and human trafficking, in line with the offences outlined in the Act.

Our business and supply chains

Innovo is a construction and real estate business headquartered in the UK. We offer services in construction, real estate development, project finance and management, supply chain management, venture capital and private equity, with operations across the MENA region, primarily in the United Arab Emirates. Our supply chain partners comprise consultants, contractors, subcontractors and suppliers.

Innovo's company culture is built on integrity, compassion and transparency. We are committed to engaging on human rights and eradicating modern slavery and human trafficking in our business and supply chain. We continually strive to conduct our operations ethically and honestly and uphold the dignity and rights of our people and partners.

Innovo mitigates the risk of modern slavery practices through policy commitments and working only with reputable supply chain partners.

Risk levels

The construction sector remains susceptible to instances of modern slavery practices. This is due to factors including a fear of reporting, low levels of awareness and the hidden nature of the crime. Labour risks are concentrated primarily in the supply chain and the delivery of construction services.

We do not tolerate instances of modern slavery anywhere in our operations and supply chain and have implemented robust measures to prevent and address it, as outlined below.

Policies and procedures

We analyse modern slavery risk in the context of other exploitative practices, including health and safety negligence, substandard accommodation, excessive working hours, withholding of wages or personal possessions, physical, visual or verbal intimidation and abuse or non-compliance with labour laws.

Our policies and practices clearly prohibit all forms of modern slavery across our group and supply chain, including during the recruitment and selection of individuals.

- Our **Innovo Code of Business Conduct** requires the assessment of ethical risk and the reporting of unethical conduct. It also underlines the importance of dealing with supply chain partners fairly and transparently and reinforces our commitment to operating ethically, acting with integrity and enforcing effective systems and controls to prevent modern slavery in our operations and supply chain.

- Our **Whistleblowing Policy** encourages the reporting of modern slavery suspicions and human rights abuses, while ensuring the protection and anonymity of whistleblowers.

- Our **Global HR Policy** sets out our commitment to creating a workplace where intimidation, bullying and harassment are not tolerated. It recognises the dignity of every individual and reinforces our commitment to fair and respectful treatment.

Workers and worker welfare

Workers are a vital part of our business. Our Worker Welfare Framework sets out our commitment to embedding worker welfare, dignity and wellbeing into our culture and management systems. We have established a robust worker welfare governance system, supported by a dedicated worker welfare team responsible for promoting, supporting and monitoring the wellbeing, safety, dignity and morale of our workers. Senior leadership actively engages with employees and workers across our project sites, accommodation facilities and other operational locations to understand their concerns, review welfare performance and support the timely resolution of identified issues.

Our Workers' Employment and Facilities Policy reflects Innovo's commitment to respecting human rights and maintaining fair, ethical and responsible employment practices throughout our operations, recruitment activities and supply chain. The Policy prohibits forced or compulsory labour, human trafficking and child labour, and requires all employment relationships to be entered into voluntarily, transparently and on the basis of informed consent.

Innovo does not employ anyone under the age of 18 and undertakes appropriate age and identity verification before employment begins. We are committed to ensuring that individuals receive clear and accurate information, in a language they understand, regarding the nature and conditions of their employment, including remuneration, working hours, rights and responsibilities, accommodation arrangements, grievance mechanisms and relevant health and safety requirements.

Our supply chain due diligence processes are designed to promote responsible business conduct and manage risks relating to worker welfare, human rights, ethical practices, health and safety, and environmental protection. These processes include pre-qualification assessments during the initial selection of subcontractors and suppliers, supported by ongoing risk-based monitoring and assurance activities throughout the business relationship.

Depending on the nature and level of risk identified, our due diligence activities may include document reviews, workplace and accommodation inspections, confidential worker interviews, compliance audits, corrective-action plans and follow-up verification to confirm that identified issues have been effectively addressed and closed.

Supporting our policies and governance framework, we have established a range of core standards and due diligence measures to identify, prevent and mitigate modern slavery risks across our operations and supply chains, including:

- Multilingual induction and training programmes, supported by ongoing monitoring.

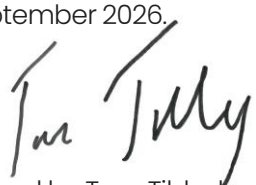
- Monitoring and assessment processes, including regular worker consultation, feedback and accessible grievance and complaints mechanisms.

- Fair and transparent employment practices covering recruitment, employment contracts, wages and working hours.

- Measures designed to ensure that individuals enter employment freely and voluntarily, without coercion, deception or threat of penalty.
- Risk-based audits of worksites and subcontractors to assess compliance with our policies and standards.
- Appropriate support and assistance for any employee affected by modern slavery.
- Annual reviews to monitor compliance with applicable employment laws and regulations in each jurisdiction in which we operate.
- The inclusion of human rights and worker welfare within our internal audit programme, delivered by an independent third party.

Approval

This statement was approved by the Board of Directors of Innovo Holding Limited in September 2026.



Signed by Tom Tildesley, Board Director

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