



# Modern Slavery Statement 2025

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the actions of Groundsure Limited (“Groundsure”) in addressing modern slavery and human trafficking risks in our business and supply chain for the financial year ending 30 June 2025.

## Our Commitment

Groundsure acknowledges that modern slavery remains a significant global issue and a serious violation of fundamental human rights. We recognise our responsibility to act ethically and with integrity in all our relationships, and this statement sets out our approach to preventing and addressing modern slavery and human trafficking in our organisation and supply chain.

## Our Organisation and Supply Chains

Groundsure has provided environmental desk-based analytics and environmental data for the last 25 years to the property transaction, lending and development sectors.

We are Brighton based with serviced offices in Cornwall. We work with suppliers and partners primarily in the UK.

Our supply chain includes third party environmental data and report suppliers, cloud services, serviced office and hospitality providers. Our profile has a low vulnerability to modern slavery due to the industry that we operate within and our operations being primarily technological. We endeavour to reduce this further by fostering enduring partnerships with our suppliers and by maintaining our B Corp and EcoVadis certifications. The B Corp values of transparency, accountability and inclusivity are embedded into all areas of the Groundsure business, including its approach to the eradication and prevention of modern slavery.

## Policies and Commitments

We have implemented a suite of internal policies and frameworks that support ethical conduct and the prevention of modern slavery. These include:

- **Employee Code of Conduct:** details our core beliefs and behaviours to treat individuals fairly and respectfully and that this is the responsibility of all;
- **Supplier Code of Conduct:** embedded within our Purchase Order terms and conditions which require our suppliers to comply with numerous corporate responsibilities including the prevention of Modern Slavery in accordance with the Modern Slavery Act;
- **Sustainable Procurement Policy:** includes assessments of our key suppliers which evaluates their processes to comply with the Modern Slavery Act; and
- **Whistleblowing Policy:** encourages employees and suppliers to report concerns confidentially and without fear of retaliation in relation to the Modern Slavery Act and other matters.

These policies are reviewed annually and communicated to all relevant employees and suppliers.



## Risk Assessment and Due Diligence

We assess potential risks of modern slavery through:

- Including modern slavery clauses in supplier contracts.
- Annual supplier assessments for key suppliers. Where contractual compliance with our Code of Conduct cannot be obtained, we conduct audits to ensure supplier suitability. All new suppliers are required to provide a declaration of compliance with our Code of Conduct unless otherwise approved by the Executive team.

Where modern slavery risks are identified or suspected, we will seek to work collaboratively with suppliers to improve standards, transparency and ethical practices.

## Training and Awareness

We provide training to employees in relevant roles, particularly those involved in procurement and supply chain management, to help them identify signs of modern slavery and understand our reporting procedures.

## Measuring Effectiveness

We monitor the effectiveness of our approach by evaluating the outcomes of supplier audits and assessments throughout the year. A summary of findings is reported annually to the Executive team. We are committed to continuous improvement through periodic reviews with the aim of strengthening our approach.

## Approval

This Modern Slavery Statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of Directors of Groundsure via written resolution on 10 December 2025. This statement shall be reviewed and updated annually.

Signed by:

Malcolm Smith

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**Malcolm Smith**

CEO and Director  
Groundsure Limited

Version	Date	Notes/Changes Reviewed/Approved by
1.0	03 December 2025	Created by Legal, Executive Team and HR, approved by CEO