

SLAVERY AND HUMAN TRAFFICKING



POLICY STATEMENT for the financial year ended 31 December 2025

Company Overview

Aspire Defence Limited ("ADL") is a special purpose company responsible, in accordance with the terms of a Private Finance Initiative Contract known as Project Allenby Connaught, for the construction of, and hard and soft facilities maintenance services to, living and technical accommodation at military garrisons around Salisbury Plain and in Aldershot. ADL is a wholly owned subsidiary of Aspire Defence Holdings Limited. ADL has one client, the Defence Infrastructure Organisation, which is part of the Ministry of Defence. ADL currently has 20 employees, the majority of whom hold professional qualifications.

Supply Chain

Long term contracts are in place with Aspire Defence Capital Works and Aspire Defence Services, both of which are unincorporated joint ventures between wholly owned subsidiaries of KBR Inc. for the provision of construction and hard and soft facilities maintenance services respectively. KBR Inc. has a zero-tolerance policy to slavery and human trafficking in its business and supply chain. The subcontract parties are approved by the Ministry of Defence and they hold any required accreditations or appropriate qualifications for the services they deliver. In order to maintain services employees of the key suppliers and those of their sub-contractors are required to meet UK Government security clearance requirements. ADL considers these key suppliers to be in locations and areas of activity that are low risk in relation to slavery and human trafficking.

Policy

The Board of Directors of ADL has a zero tolerance policy to slavery and human trafficking and has a commitment to ensuring that there is no modern slavery or human trafficking in the Company or its supply chain.

ADL expects all those in its supply chain to adhere to a policy of zero tolerance to slavery and human trafficking.

As part of an ongoing due diligence process to identify and mitigate the risks of slavery and human trafficking in the supply chain, ADL has:

- Continued to make due enquiries with its immediate supply chain to establish and monitor their policies with regard to slavery and human trafficking within their organisations and their supply chain;
- Continued to communicate this policy to the immediate supply chain to make them aware of Aspire's requirement for their understanding and compliance with the policy;
- Ensured that its employees are aware of the company's "whistle blowing" procedures;
- Provided training about slavery and human trafficking for those staff with regular interaction with supply chain personnel; and
- Measured and monitored the number of employees who have received such training in the year and its efficacy.

ADL will review this statement on an annual basis. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the year ended 31 December 2025.