

MODERN SLAVERY STATEMENT

(2026)

INTRODUCTION

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015, which requires employers to demonstrate transparency in the steps they take to prevent modern slavery and human trafficking in their own operations and supply chains.

Boston Limited maintains a zero-tolerance approach to all forms of modern slavery, including slavery, servitude, human trafficking, and forced labour. We remain committed to conducting our activities with the highest ethical standards and ensuring our supply chain partners uphold these same principles. Our responsibility extends to every region in which we operate, ensuring that all individuals working for or with us are treated fairly, with dignity and with respect for their fundamental human rights.

OUR BUSINESS

Since 1992, Boston Limited has been a leader in delivering high-performance, power-optimised technologies across the ISP, HPC, Enterprise, and Broadcast markets. Our solutions include servers, storage, workstations, and clustered systems engineered through a combination of deep sector expertise, innovation, and scalable operational capability.

Our headquarters are based in the United Kingdom, with additional branches and related entities in Germany, India, France, Australia, South Africa, and the United States. Our global footprint heightens our awareness of human rights responsibilities and drives our commitment to proactively prevent modern slavery in all territories in which we operate.

OUR POLICIES

Boston Limited has a robust framework of policies designed to safeguard workers and uphold ethical and responsible business practices. These include:

- Equal Opportunity Policy
- Modern Slavery Policy
- Standards of Business Conduct Statement
- Employee Handbook
- Peoples Policy
- Corporate and Social Responsibility Policy

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- Procurement Policy
- Working Time Policy
- Ethics, Equality and Diversity Policy
- Disabled Workers Policy
- Whistle-Blowing Policy

These policies are reviewed regularly and updated as needed to ensure effectiveness. Over the past reporting period, we continued to improve our Whistle-Blowing Policy, Procurement Policy, Peoples Policy, and purchasing practices, strengthening the governance systems that protect our employees and our supply chain.

New & Strengthened Actions in 2025

- Implemented a Remuneration Policy for our South Africa office, ensuring pay fairness, transparency, and alignment with local employment legislation.
- Renewed our Living Wage pledge, reinforcing our commitment to fair compensation for all employees.
- Continued use and expansion of our company-wide training platform with mandatory training on Modern Slavery Awareness and Human Trafficking.
- Maintained our KPI requiring a minimum of 85% annual staff completion of the 'Modern Slavery in the UK' training module.
- Continued annual Right to Work audits and monthly reviews of working hours and overtime reporting.
- Conducted annual salary reviews to ensure compliance with National Minimum Wage legislation and global equivalents.

Supply Chain and Supplier Governance

- Conducted in-depth audits of suppliers' Modern Slavery Statements against UK Government guidance.
- Identified high-risk suppliers and provided targeted support and corrective action requirements.
- Expanded supply chain risk assessments to ensure continuous improvement and stronger oversight.
- Introduced performance indicators and future targets to measure long-term impact and compliance.

OUR RISKS

As a global business, we acknowledge that exposure to modern slavery risk varies by geography, local labour standards, and the complexity of supply chains. Higher-risk areas include regions where labour

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protections may be weaker or where vulnerable groups—such as migrant workers or students—are more susceptible to exploitation.

- Our risk management approach includes:
- Detailed supplier vetting
- Regular audits
- Continuous supply chain monitoring
- Risk assessments aligned to the 11 International Labour Organization (ILO) indicators of forced labour, including excessive overtime, debt bondage, document retention, deception, and restricted movement

Any identified risks or indicators prompt immediate investigation and corrective action. Our Senior Management Team maintains overall accountability for reviewing the effectiveness of our controls and ensuring compliance with the Modern Slavery Act.

OUR SUPPLY CHAIN

Boston Limited maintains long-standing partnerships with financially stable and ethically responsible suppliers. Our procurement process includes:

- Pre-approval checks before suppliers are added to our approved supplier list
- Annual reviews of Modern Slavery Statements and compliance documentation
- Ongoing due diligence of contractors and partners
- Clear expectations of ethical standards and human rights protections

Where suppliers fail to meet our required standards, we request improvement actions and reserve the right to terminate relationships where progress is not made. Any supplier found to be involved in forced labour or human trafficking will immediately be removed from our supply chain, with further action taken as necessary.

OUR EMPLOYEES

Our employees play an essential role in identifying and preventing modern slavery. All employees are required to undertake training and are encouraged to report concerns confidentially, without fear of retaliation. Posters, communications, and internal campaigns continue to raise awareness across all sites globally.

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Our Employee Handbook and Peoples Policy detail our commitment to:

- Fair working conditions
- Clear terms of employment
- Appropriate working hours
- Safe working environments
- Paid holiday entitlements
- Zero tolerance for coercion or forced labour

Specific training is provided to Management and Procurement teams to ensure they understand the risks associated with complex supply chains and their responsibility in identifying, assessing, and reporting concerns.

OUR COMMITMENT

Boston Limited remains committed to continuous improvement in our efforts to prevent modern slavery and human trafficking. This Modern Slavery Statement is issued for the financial year January 2025 – December 2025 and has been approved by the Board of Directors on 15 January 2026

Manoj Nayee



[Manoj Nayee \(Jan 21, 2026 12:48:23 GMT\)](#)

Managing Director, Boston Limited