



Modern Slavery Statement

For the financial year ending 31st December
2025

Contents

Introduction	3
Our organisation's structure and business	3
Compensation	3
Training	3
Policies	4
Due diligence processes for slavery and human trafficking	4
Key performance indicators	5
Responsible individual	5
Further steps	5
Approval	6

Introduction

Gearset Ltd ("Gearset," "the Company") is a commercial Software as a Service (SaaS) business headquartered in Cambridge, England. We specialise in providing Salesforce DevOps solutions to a diverse range of customers. Gearset is committed to preventing slavery and human trafficking in all its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 ("the Act") and constitutes Gearset's slavery and human trafficking statement for the financial year ending 31 December 2025. It outlines the steps Gearset has taken during this financial year to identify, prevent, and mitigate the risks of modern slavery in its business operations and supply chains. Gearset acknowledges the importance of transparency and is dedicated to continuously improving its practices to combat modern slavery. This statement reflects our commitment to acting ethically and with integrity in all our business dealings and relationships.

Gearset maintains a culture of vigilance, encouraging all employees to identify and report even the smallest indications of exploitation.

Our organisation's structure and business

Gearset is a provider of standardised, off-the-shelf, Salesforce DevOps SaaS products. Our primary operations, including software development, product, sales, and customer support, are based in Cambridge (England). Gearset maintains a number of satellite offices in Chicago (USA), London (England), and Belfast (Northern Ireland). As a SaaS provider, our business model relies on the intellectual property developed by our internal skilled workforce and the third party supplier infrastructure required to deliver our software to customers globally.

Compensation

We ensure compliance with all employment legislation, including national minimum wage, working hours, and health and safety standards. All employees of Gearset, and any contractors, are paid at the United Kingdom living wage levels or higher.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, Gearset has deployed a company-wide modern slavery training. This aligns with the commitment made by the business in its 2024 statement. We

have an established process in place for monitoring completion and reporting to our senior leadership and wider board as required.

Policies

Gearset is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This statement affirms this intention to act ethically in our business relationships. We operate a number of internal Gearset policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Internal knowledge hub** - our approach to business outlines the expectation for all employees to act with integrity, respect, and in compliance with all laws.
- **Recruitment** - we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees and contractors to safeguard against human trafficking or individuals being forced to work against their will.
- **Whistleblowing** - our whistleblowing policy ensures that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal.
- **Equality and Diversity** - this policy is designed to ensure the fair treatment of our employees and potential employees.
- **Health and Safety** - this policy sets out our approach to ensure we provide a healthy working environment for our staff and contractors that work out of our premises and from home.

Due diligence processes for slavery and human trafficking

Gearset undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers in regards to Modern Slavery. For our key suppliers, such as data centre providers and hardware manufacturers, this due diligence involves reviewing their own published Modern Slavery Statements and, where necessary, requesting additional clarifications. We aim to identify any material Modern Slavery and Human Trafficking concerns as a part of our supplier due diligence and performance reviews process. The specific steps that are necessary to identify the Modern Slavery and Human Trafficking concerns may vary based on each vendor due to the sector and geographic risk of the supplier.

Within our business, all employees are issued with clear contracts of employment outlining their terms and conditions, rights, and responsibilities. We ensure compliance with all employment legislation, including national minimum wage, working hours, and health and safety standards. We promote a culture of respect and fairness, where employees feel able to raise concerns through established channels.

During the 2025 financial year, no breaches or modern slavery concerns were reported through our whistleblowing or supplier review channels.

Key performance indicators

Gearset uses the following KPIs to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- 95% of employees and contractors of the business (at any time throughout the year) are required to have completed the Modern Slavery awareness training in the past 12 months;
- 100% of breaches are assessed within a reasonable time of being reported and further investigations concluded as soon as possible thereafter; and
- 100% of employees and contractors employed by Gearset are paid at least at Living Wage levels.

Responsible individual

We have defined our Legal and Compliance Manager to act as our Anti-Slavery Compliance lead, who will take responsibility for our ongoing actions to combat slavery and human trafficking within Gearset.

Further steps

Gearset is committed to the ongoing fight against modern slavery and human trafficking. We view our efforts as a continuous journey of improvement, and recognise that more can always be done to strengthen our processes and mitigate risks. We intend to take the following further steps to combat slavery and human trafficking in the future:

- Include appropriate measures in our due diligence processes for sourcing suppliers, subcontractors and acquisitions on a risk assessed basis.
- Provide further training to relevant employees to ensure a high-level understanding of the risks of modern slavery and human trafficking.
- Where appropriate we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

Approval

This Statement has been considered and approved by the Board of Directors of Gearset Ltd on 24th February 2026.

Signed on behalf of the Board of Directors:

Signed by:

Jason Greenwood

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Name: Jason Greenwood

Title: COO & Company Secretary