UK Modern Slavery Transparency Statement

November 30th, 2026

Introduction

This statement is made on behalf of Vialto by CD&R Galaxy UK Opco Limited ("Vialto UK"), in respect of actions and activities carried out during the financial year ending 30 June 2026 (FY26), pursuant to section 54 of the Modern Slavery Act 2015 (the "Act").

Vialto maintains a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and ensuring that effective systems and controls are in place to prevent human rights abuses within our business and supply chains.

Our approach is informed by internationally recognised human rights standards and guidance, including the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. These standards, together with our Human Rights and Modern Slavery Policy, shape our policies, due diligence processes, and risk management practices.

Our Structure and Supply Chain

Vialto is a global mobility business with a presence in more than 50 countries, operating across over 150 countries and territories, and employing over 7,000 professionals worldwide. Vialto's UK-based operating entity, CD&R Galaxy UK Opco Limited (Vialto UK"), is subject to the provisions of the Act.

The network includes both Vialto UK-owned companies and independent, locally owned firms. All entities operate under the Vialto Partners brand and collaborate to deliver consistent, high-quality services. While adapting to local regulations, entities are guided by shared global policies and standards.

Vialto provides immigration, tax, and mobility consulting services to multinational clients, including global tax, immigration and business travel compliance, compensation and payroll, and remote-work solutions supported by analytics and mobility technology. Our services are delivered in collaboration with alliance partners such as relocation companies, payroll providers, assignment-management systems, business-travel platforms, and core HR and finance vendors.

To support these operations, we work with a global supply base of more than 3,000 suppliers and a trusted Third-Party Network (TPN) that extends our reach into jurisdictions where Vialto does not have a legal entity or local office. Supplier onboarding and ongoing due diligence is carried out through our Third-Party Due Diligence (TPDD) process, supported by our Ariba supplier onboarding system.

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Risk Identification

We take a risk-based approach to identifying where modern slavery risk is most likely to arise across our operations and supply chain. Suppliers and TPN affiliates are tiered using factors including geography, sector and service type and the supplier operating model.

While the overall risk of modern slavery within our own professional services workforce is considered low, we also consider risk factors within our direct workforce, such as the use of agency or temporary staff and visa-sponsored roles.

Due Diligence and Risk Mitigation

Vialto's due diligence and risk management processes are managed by the Global Legal, Risk and Compliance (LRC) team in partnership with the Procurement team. Our due diligence process includes:

- **Supplier due diligence during onboarding**: new suppliers are screened through our third-party due diligence (TPDD) process via the Ariba supplier onboarding system and are required to either adhere to our Global Third-Party Code of Conduct (TPCoC), which prohibits modern slavery, or to provide their own Code of Conduct that demonstrably addresses equivalent modern slavery and related human rights standards.
- **Contractual safeguards**: our supplier agreements include requirements to comply with our TPCoC and applicable laws and regulations.
- **Enhanced due diligence**: higher-risk suppliers, identified using the risk factors set out above, are subject to enhanced screening, additional policy review, and ongoing monitoring.
- **Ongoing monitoring**: we use sanctions and adverse media screening, whistleblowing reports, and supplier reviews to identify potential issues.
- **Remediation and response**: concerns identified through due diligence, monitoring, or the Ethics Whistleblower Helpline are reviewed by the LRC team. Where potential issues are confirmed, we engage with the supplier to conduct investigations, implement corrective actions, and undertake root cause analysis to prevent recurrence, consistent with the remediation commitments set out in our Human Rights and Modern Slavery Policy.

Policies

Our policies provide the framework for protecting human rights and ensuring safe, fair working conditions across our business and supply chains. They explicitly prohibit all forms of modern slavery, including forced, bonded, or child labor and human trafficking. These requirements apply to employees, contractors, suppliers, third parties, and affiliates. Vialto's public policies addressing modern slavery are available on our website:

- Human Rights and Modern Slavery Policy
- Global Code of Conduct
- Global Third-Party Code of Conduct

We promote a strong speak-up culture through our confidential Ethics Whistleblower Helpline, which enables employees, clients, suppliers, and third parties to report concerns about potential human rights violations or modern slavery, anonymously where permitted:

- Web: https://vialtopartners.ethicspoint.com
- Mobile: https://vialtopartnersmobile.ethicspoint.com

Training

To support the implementation of these policies, all Vialto employees complete mandatory annual Modern Slavery training, covering how to identify potential signs of exploitation, apply Vialto's policies and standards in practice, and raise or escalate concerns through appropriate channels.

Effectiveness, Governance and Continuous Improvement

We regularly assess the effectiveness of our approach to identifying and preventing modern slavery across our operations and supply chains. The table below tracks our key performance indicators year on year:

Metric	FY25	FY26	FY26 commentary / Target
Employees completing modern slavery training	98%	99%	Target: maintain at or above 95%.
New joiners completing training on onboarding	100%	100%	Target: maintain at 100%.
Concerns raised related to modern slavery via Whistleblower communication	0	0	Target: Continue to monitor and track the number of concerns raised

Governance

Oversight of human rights and modern slavery considerations sits at Board level. Governance oversight is led by the Global Legal, Risk & Compliance team, which is responsible for the framework. Procurement implements, monitored and maintains supplier due diligence processes. Human Resources supports training and awareness, and business leadership is responsible for embedding this policy within their areas of control.

We recognize that ongoing monitoring and refinement of our processes is essential to maintaining the effectiveness of our controls. In FY27 and beyond, Vialto will continue to strengthen supplier oversight and direct workforce risk assessment and will report on our progress annually as part of its Modern Slavery Statement.

Preparing for Reform

We are monitoring the Immigration and Asylum Bill's proposed reforms to the Modern Slavery Act 2015, which would introduce mandatory “comply or explain” reporting, director accuracy certifications, a six-month publication deadline, a central public registry, and financial penalties for non-compliance. Enforcement is expected to apply from the FY27 reporting year. Vialto UK intends to submit this statement to the central public registry once that requirement is confirmed and takes effect and will continue to align its statements with the Bill's requirements as they are finalized.

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Governance Statement

During the FY26 reporting period, zero confirmed instances of modern slavery or human trafficking were identified within our operations or supply chain. We remain vigilant and committed to strengthening our approach year on year.

This statement covers the financial year 2026, starting from 1 July 2025 to 30 June 2026 and was approved by the Board of CD&R Galaxy UK Opco Limited on 17 November 2026, in accordance with section 54(1) of the Modern Slavery Act 2015.

On behalf of the board of CD&R Galaxy UK Opco Limited, I confirm that, to the best of my knowledge and belief, this statement is accurate and reflects the steps taken by Vialto UK during FY26.

Lyudmyla Davies

Lyudmyla Davies
Director

Date: November 17, 2026