



Modern Slavery and Human Trafficking Statement

Financial Year: 2025

1. Introduction

This statement is made by HighPoint Solutions, Inc. (“HighPoint” or “the Company”) pursuant to Section 54 of the UK Modern Slavery Act 2015.

HighPoint has zero tolerance for modern slavery, forced labor, human trafficking, and child labor within its business and value chain. This statement outlines the steps taken during the 2025 financial year to prevent modern slavery and human trafficking in our operations and supply chain.

2. Our Business

HighPoint is a United States–based small to medium-sized enterprise providing IT services and solutions to customers globally, including the United States, the United Kingdom, and the European Union. The Company is headquartered in Sparta, NJ, with an operational presence in Charlotte, NC, London, UK, and Amsterdam, NL.

Our services include the selection and supply of network infrastructure, security solutions, managed IT services, and related technology services.

Our workforce primarily consists of professional and technical employees and contractors. Our supply chain includes technology vendors, hardware manufacturers, software providers, and professional services firms.

3. Our Commitment to Human Rights

HighPoint is committed to respecting, protecting, and promoting internationally recognized human rights in the countries and communities in which it operates.

Our approach is aligned with the principles set out in the Guiding Principles on Business and Human Rights issued by the United Nations and the core labor standards of the International Labor Organization.

We expect our suppliers to uphold equivalent standards.

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4. Ethical Code of Conduct for Suppliers

During the 2025 financial year, HighPoint developed and formally adopted an Ethical Code of Conduct for Suppliers and commenced its rollout to new and existing suppliers.

The Code sets out our expectations regarding legal compliance, ethical conduct, and respect for human rights. Under the Code, suppliers are required to uphold the following principles:

4.1 Forced Labor

Suppliers will:

- Adopt a zero-tolerance approach to all forms of forced and compulsory labour in their business and value chain.
- Ensure employment is freely chosen.
- Not require employees to lodge deposits or identity papers as a condition of employment.
- Ensure employees are free to leave employment with reasonable notice in accordance with applicable laws and regulations.

4.2 Child Labor

Suppliers will:

- Adhere to local laws and regulations regarding the minimum age of employees.
- Comply with all applicable child labor laws and regulations.

4.3 Freedom of Association and Collective Bargaining

Suppliers will:

- Respect freedom of association and the right to collective bargaining without interference, discrimination, retaliation, or harassment, in accordance with relevant local laws and regulations.

4.4 Working Hours and Time Off

Suppliers will:

- Ensure that working hours and time off comply with national laws and standards.
- Ensure employees have the right to refuse overtime working.
- Ensure overtime is compensated in accordance with relevant local laws and regulations as a minimum.

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4.5 Wages and Benefits

Suppliers will:

- Ensure wages and benefits meet national legal and industry standards as a minimum.
- Prohibit unauthorized wage deductions, including deductions for disciplinary reasons.

4.6 Discrimination and Harassment

Suppliers will:

- Pursue equal opportunities for all employees.
- Not discriminate in hiring or employment on the basis of gender, race, national origin, age, religion, disability status, sexual orientation, veteran status, or any other protected characteristic under applicable law.
- Commit to eliminating any forms or threats of harassment in the workplace, including physical, mental, sexual, or verbal harassment.

5. Supplier Due Diligence and Compliance

As part of the rollout of the Ethical Code of Conduct for Suppliers, HighPoint is incorporating the Code into its supplier onboarding and engagement processes.

Suppliers are required to confirm compliance with the Code in writing. HighPoint reserves the right to request additional information regarding compliance where appropriate and to engage with suppliers to address any identified concerns.

Where serious breaches are identified and cannot be remediated within a reasonable timeframe, HighPoint reserves the right to terminate the relevant business relationship.

6. Risk Assessment

Given the nature of our business as a professional IT services provider, we consider the direct risk of modern slavery within our own workforce to be relatively low.

However, we recognize that potential risks may arise within broader global supply chains, particularly in connection with hardware manufacturing, outsourced services, and subcontracting arrangements. We continue to assess these risks in a manner proportionate to the size and nature of our operations.

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7. Internal Practices

Within our own operations, HighPoint:

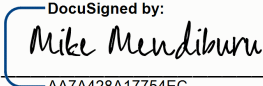
- Complies with applicable employment and labor laws in the jurisdictions in which it operates.
- Verifies employees' eligibility to work.
- Provides written employment documentation setting out terms and conditions of employment.
- Maintains policies addressing equal opportunity, anti-harassment, and ethical conduct.

8. Continuous Improvement


HighPoint recognizes that its approach to modern slavery risk management continues to develop. We are committed to strengthening our processes over time, including enhancing supplier engagement and internal awareness.

9. Approval

This statement has been approved by the Board of Directors of HighPoint in accordance with Section 54 of the UK Modern Slavery Act 2015 and will be reviewed annually.

Signed: 
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Name: Mike Mendiburu
Title: President & CEO
Date: April, 16th, 2026

Signed: 
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Name: Tom Mendiburu
Title: Co-Founder
Date: April, 16th, 2026

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