Modern Slavery Transparency Statement

Introduction

This statement, relating to the financial year ending 26 September 2026, is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the approach which Roadside Real Estate plc ("**Roadside**") and its subsidiaries (together the "**Group**") have taken to understand modern slavery risks related to our business and mitigate such risks.

Modern slavery is a crime and a gross violation of fundamental human rights. The Group is committed to acting ethically and with integrity in all our business dealings and to implementing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our organisation or supply chains.

Our Business

Roadside is a UK listed (Alternative Investment Market) company that primarily operates a network of petrol forecourts across the United Kingdom, offering fuel retail, convenience store goods including food and beverage to-go and associated ancillary services such as parcel collection and car washing facilities.

Our supply chains include fuel procurement, logistics and distribution, retail goods (including food and beverages), and third-party contracted services such as post office, laundrettes, third party food platforms, parcel lockers etc.

The Group currently employs c. 300 people directly within the business in England which it has assessed as relatively low risk in relation to slavery and human trafficking.

The Group also has a commercial co-investment arrangement with Meadow Partners LLP through which it has an investment in a number of UK roadside retail assets.

Group companies:

As at 26 September 2026, the Group comprised:

Companies registered in the UK

- Roadside Infrastructure Ltd
- Roadside REIT Ltd
- Roadside Asset Management Ltd
- Gardner Retail Ltd
    - Gardner Garages Ltd
    - Gardner Garages Properties Ltd

    - Gardner Properties (Trowbridge) Ltd
- Hoch Group Ltd
    - Hills of Corby Hill Ltd
    - Hills of Lakeland Ltd
- D.A. Roberts Fuels Ltd
    - D.A. Roberts Haulage Ltd

Governance and Policies

The Group maintains a developing governance framework to address modern slavery and human trafficking risks. Key policies include:

- Anti-Slavery and Human Trafficking Policy
- Supplier Code of Conduct
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy

As part of the post-acquisition integration process, these policies are being rolled out across the enlarged Group, with a focus on ensuring consistent standards and expectations.

Oversight of these matters rests with the Board of Directors, supported by senior management.

Risk Assessment and Due Diligence

The Group is undertaking a risk-based approach to identifying and assessing modern slavery and human trafficking risks across its expanded operations.

Actions undertaken to date include:

- Preliminary risk assessment of the acquired business
- Review of key supplier relationships
- Identification of gaps relative to Group standards
- Implementation of priority controls in higher-risk areas

Integration Activities

Following completion of the acquisitions, the Group is in the process of initiating a structured integration programme, including:

- Extension of Group policies and procedures to the acquired business

- Communication of expectations to employees and key suppliers
- Introduction of appropriate contractual provisions where required
- Planning for enhanced supplier due diligence and audit activity

No instances of modern slavery or human trafficking have been identified to date; however, the Group recognises that further work is required to fully embed its control framework.

Training and Awareness

The Group is in the process of developing and implementing training programmes to support employees in identifying and responding to risks of modern slavery and human trafficking.

Priority is being given to employees in procurement, operations, and site management roles. Broader awareness initiatives will be rolled out across the organisation during the course of the financial year.

Reporting and Whistleblowing

The Group operates a confidential whistleblowing framework through which employees and external stakeholders may raise concerns.

As part of the integration process, steps are being taken to ensure that these mechanisms are accessible and understood across the enlarged Group, and that concerns can be raised without fear of retaliation.

Ongoing Development

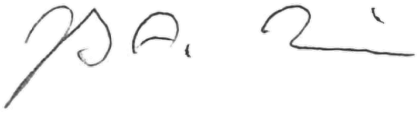
The Group is currently enhancing its approach to managing modern slavery and human trafficking risks and will continue to do so throughout the financial year.

Key priorities include:

- Completing detailed supply chain mapping and risk assessments
- Enhancing supplier onboarding and monitoring processes
- Delivering targeted training programmes
- Strengthening governance, oversight, and reporting

Board Approval

This statement was approved by the board of directors of Roadside on 2 November 2026.



For and on behalf of Roadside

Douglas Benzie

Director

2 November 2026