

Modern Slavery Policy

V3.5 112025

1. Our commitment

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, whether in the receipt of support of our delivery of our consultancy services or generally in the receipt of services from our business partners.
- 1.3. We expect the same high standards from all of our suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers and business partners will hold their own suppliers to the same high standards.
- 1.4. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, volunteers, interns, agents, contractors, suppliers, third-party representatives and business partners.
- 1.5. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

2. Responsibility for the policy

- 2.1. The board of directors has overall responsibility for ensuring compliance with modern slavery legislation and that this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2. The compliance manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.4. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the compliance manager.

3. Compliance with the policy

- 3.1 You must ensure that you read, understand and comply with this policy. In particular, you should read Annex A of this policy which sets out the offences of Section 1 and Section 2 of the Modern Slavery Act 2015 together with Section 3 which sets out the definition of exploitation.

- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify your manager or the compliance manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the compliance manager or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains. We may also remove an organisation from any preferred supplier list that we may operate from time to time, or generally not deal with any supplier. We may also pass details to appropriate law enforcement bodies as applicable.
- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the compliance manager.
- 3.7 We undertake the following steps within our business operations to try help us minimise the risks of such activity within our supplier chains:
- i) All suppliers and business partners must comply with a number of compliance requirements of ours in order to supply work seekers to us when supporting our digital services to our customers;
 - ii) All suppliers and business partners to our organisation are required to evidence their modern slavery statements and policies (and we educate very small suppliers such as individual contractors whether operating on a self-employed basis or through their own limited company which they manage and control on the impact of and prevention of modern slavery and human trafficking);
 - iii) We undertake audits and spot checks and related due diligence on our supplier chains from time to time;
 - iv) Suppliers and business partners may be asked to complete a questionnaire on how they tackle modern slavery in their supply chain (as applicable);
 - v) Our contracts with suppliers require warranties and undertakings in respect of modern slavery and human trafficking and we seek provisions in respect of compliance with modern slavery legislation in our business partner contracts where business partners are working to their own terms of business with us and such commitment is absent;
 - vi) We undertake training and awareness amongst our staff, particularly those staff who operate payroll within our finance team and those staff who work closely with our suppliers when delivering transformation programmes for our customers.

3.8 As part of our commitment and effort in this area, we have prepared a modern slavery statement which will be reviewed on an annual basis, and which is set out as Annex B to this policy which can be released to evidence our compliance and steps we have taken, whether in response to bids/tenders or at the request of our customer.

3.9 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which you may obtain from our People Hub.

4. Communication and awareness of this policy

4.1 Training on this policy, and any risks our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

4.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. Breaches of this policy

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6. Review and Publication

6.1 This policy is reviewed annually by the Chief Legal Officer and approved by the Board.

6.2 The annual modern slavery statement in compliance with s54(1) of the Modern Slavery Act 2015 is published on our website homepage.

Approved by the sole director on 30th June 2025

Next review: 1st May 2026

Annex A – definitions contained in the Modern Slavery Act 2015

Section 1 - Slavery, servitude and forced or compulsory labour

(1) A person commits an offence if:

(a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or

(b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

(2) In subsection (1) the references to holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention.

(3) In determining whether a person is being held in slavery or servitude or required to perform forced or compulsory labour, regard may be had to all the circumstances.

(4) For example, regard may be had–

(a) to any of the person's personal circumstances (such as the person being a child, the person's family relationships, and any mental or physical illness) which may make the person more vulnerable than other persons;

(b) to any work or services provided by the person, including work or services provided in circumstances which constitute exploitation within section 3(3) to (6).

(5) The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.

Section 2 - Human trafficking

(1) A person commits an offence if the person arranges or facilitates the travel of another person ("V") with a view to V being exploited.

(2) It is irrelevant whether V consents to the travel (whether V is an adult or a child).

(3) A person may in particular arrange or facilitate V's travel by recruiting V, transporting or transferring V, harbouring or receiving V, or transferring or exchanging control over V.

(4) A person arranges or facilitates V's travel with a view to V being exploited only if–

(a) the person intends to exploit V (in any part of the world) during or after the travel, or

(b) the person knows or ought to know that another person is likely to exploit V (in any part of the world) during or after the travel.

(5) "Travel" means:

(a) arriving in, or entering, any country, (b) departing from any country,

(c) travelling within any country.

(6) A person who is a UK national commits an offence under this section regardless of–

(a) where the arranging or facilitating takes place, or (b) where the travel takes place.

(7) A person who is not a UK national commits an offence under this section if– (a) any part of the arranging or facilitating takes place in the United Kingdom, or

(b) the travel consists of arrival in or entry into, departure from, or travel within, the United Kingdom.

Section 3 – Meaning of Exploitation

(1) For the purposes of section 2 a person is exploited only if one or more of the following subsections apply in relation to the person.

Slavery, servitude and forced or compulsory labour

(2) The person is the victim of behaviour:

- (a) which involves the commission of an offence under section 1, or
- (b) which would involve the commission of an offence under that section if it took place in England and Wales.

Sexual exploitation

(3) Something is done to or in respect of the person:

(a) which involves the commission of an offence under–

1. (i) Section 1(1)(a) of the Protection of Children Act 1978 (indecent photographs of children), or
2. (ii) Part 1 of the Sexual Offences Act 2003 (sexual offences), as it has effect in England and Wales, or

(b) which would involve the commission of such an offence if it were done in England and Wales.

Removal of organs etc

(4) The person is encouraged, required or expected to do anything:

(a) which involves the commission, by him or her or another person, of an offence under section 32 or 33 of the Human Tissue Act 2004 (prohibition of commercial dealings in organs and restrictions on use of live donors) as it has effect in England and Wales, or

(b) which would involve the commission of such an offence, by him or her or another person, if it were done in England and Wales.

Securing services etc. by force, threats or deception

(5) The person is subjected to force, threats or deception designed to induce him or her–

(a) to provide services of any kind,

(b) to provide another person with benefits of any kind, or (c) to enable another person to acquire benefits of any kind.

Securing services etc. from children and vulnerable persons

(6) Another person uses or attempts to use the person for a purpose within paragraph (a), (b) or (c) of subsection (5), having chosen him or her for that purpose on the grounds that–

(a) he or she is a child, is mentally or physically ill or disabled, or has a family relationship with a particular person, and

(b) an adult, or a person without the illness, disability, or family relationship, would be likely to refuse to be used for that purpose.