



Slavery and Human Trafficking Statement for Financial Year 2025

Inetum Digital Services UK Limited

1. Introduction

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by **Inetum Digital Services UK Limited** (the “**Company**”) and **Inetum Group** during the **financial year ended 31st December 2025** to prevent modern slavery and human trafficking in its business and supply chains. All actions undertaken by the Company to prevent and combat modern slavery and human trafficking were implemented under the supervision of the Inetum Group, which continuously applies the measures described in this document.

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 have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

Accordingly, the Company will not knowingly use unlawful child labour or forced labour in any of the products and/or services it provides, nor will it accept commodities, products and/or services from suppliers that employ or utilize child labour or forced labour.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third party representatives and business partners.

2. Our organization, business and supply chains

The Company is a member of the international Inetum Group. The Company operates in the field of **IT and digital services**, providing professional services to corporate and public sector clients.

The Company's operations are primarily office-based and are carried out in jurisdictions with established labour and employment law frameworks.

The Company's supply chain mainly consists of:

- professional and IT service providers, partners and subcontractors,
- recruitment agencies,
- IT software and IT hardware suppliers,
- office and business service suppliers.

Given the nature of the Company's activities, the risk of modern slavery occurring within its own operations is considered low. Nevertheless, the Company recognises that modern slavery can

occur in all sectors and jurisdictions and therefore adopts a risk-based and proportionate approach to managing this risk.

3. Policies in relation to modern slavery

The Company and Inetum Group have a **zero-tolerance approach** to all forms of modern slavery, including slavery, servitude, forced or compulsory labour and human trafficking.

During 2025, the Company continued to apply its **modern slavery related policies**, including:

- Code of Ethics;
- Gift and Hospitality Policy;
- Procedure on Business Intermediaries;
- Internal Whistleblowing System Policy;
- Fair Competition Group Policy;
- Anti-corruption Group Policy
- Conflicts of Interests Group Policy.

The aforementioned policies:

- reflect the Company's commitment to acting ethically and with integrity in all business relationships;
- prohibits the use of forced labour and unlawful child labour;
- sets expectations for employees, contractors, suppliers and business partners;
- applies to all persons working for or on behalf of the Company in any capacity.

All aforementioned policies are reviewed regularly and are updated as appropriate.

4. Due diligence processes

The Company's approach to due diligence is proportionate to the nature, size and risk profile of its business.

During the 2025 financial year, the Company:

- relied on internal recruitment processes and reputable employment agencies;
- required employees to have the legal right to work in the relevant jurisdiction;
- applied contractual standards and ethical expectations in relationships with suppliers and business partners;
- reserved the right to terminate relationships where serious breaches of ethical or legal standards are identified.

In addition, during the 2025 financial year, the Company continuously:

- conducted compliance background checks in respect of new and existing suppliers and clients, including through the implementation of periodic background checks;
- applied a Sustainable Procurement Charter to all suppliers, which requires suppliers to apply and respect the principles of the Global Compact, including the Universal Declaration of Human Rights of 1948, in particular with regard to human rights, labour standards, environmental protection, anti-corruption, fair competition, as well as economic sanctions and export control requirements. This Sustainable Procurement Charter is systematically added to purchase orders or contracts, creating a binding commitment for all suppliers. In case where a supplier has its own ethical charter, the Company negotiates an equivalence clause;
- maintained a whistleblowing system that enables the submission of reports, including anonymous reports, by employees, job candidates, suppliers and clients.

5. Risk Assessment and Risk Management

The Company keeps the potential risk of modern slavery under review as part of its broader compliance and risk management framework.

In 2025:

- no confirmed incidents of modern slavery were identified within the Company's operations;
- the Company continued to assess risks on a proportionate basis, taking into account the nature of services provided and the geographic footprint of its suppliers;
- the Company's kept long-standing partnership with EcoVadis, established in 2019, to conduct ESG reviews and monitor suppliers presenting potential ethical or compliance risk;
- the Company integrated ESG assessments into the strategic supplier selection process.

The Company recognises that the absence of identified incidents does not eliminate risk and remains committed to continuous improvement.

6. Effectiveness

The effectiveness of the Company's approach to preventing modern slavery is monitored through:

- the operation of internal reporting and whistleblowing mechanisms;
- management oversight of ethical and compliance matters;
- periodic review of relevant policies and procedures;
- periodic compliance team meetings.

No substantiated reports of modern slavery were received during the 2025 financial year.

7. Training and Awareness

The Company is committed to raising awareness of modern slavery risks.

During 2025:

- employees had access to training and guidance on ethical conduct and compliance;
- managers were responsible for ensuring that team members understood and complied with the Company's policies;
- the Company's zero-tolerance approach to modern slavery was communicated internally and, where appropriate, to external partners.

8. Approval

This statement was approved by the **Board of Directors** of the Company and is signed on its behalf by:



Kathy-Ann Quashie
Director