

Anti-Slavery and Human Trafficking Statement

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced and compulsory labour, human trafficking, and unlawful child labour, all of which deprive a person of liberty for exploitation.

Celerity Limited ("Celerity", "the Company", "we", "our", "us") adopts a zero-tolerance approach to modern slavery and human trafficking. 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 supply chains.

Scope

This statement applies to all persons working for or on behalf of Celerity in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, consultants, third-party representatives, and business partners.

It is the responsibility of all colleagues to ensure the contents of this statement are relayed to suppliers and other business partners to ensure compliance.

This statement does not form part of any employee's contract of employment and may be varied at any time.

Organisation Structure and Supply Chain

Celerity Limited is a privately owned company with four physical offices and one virtual office in the UK, governed by a Board of Directors. We specialise in designing and deploying complex IT solutions and providing a range of IT services to clients in the public sector, NHS, and industries such as finance, defence, manufacturing, and energy.

Our supplier base is mainly UK-based, though some supply chains extend into countries considered higher-risk. We regularly review and strengthen our due diligence measures to ensure ethical compliance throughout our supply chain. Our current due diligence measures are outlined in this statement.

Definitions

- **Human Trafficking:** The process of arranging or facilitating the travel of another person with a view to exploitation, regardless of consent. Exploitation may include servitude, forced or compulsory labour, sexual exploitation, creation of indecent images, or commercial dealings in bodily organs.
- **Modern Slavery:** Severe exploitation of people for personal or commercial gain, including behaviour that denies a person their right to freedom.
- **Forced or Compulsory Labour:** Work that someone is forced to do involuntarily under threat of punishment, including debt bondage, poor conditions, and little or no pay.

Our Commitments

- **Zero-Tolerance:** We maintain a zero-tolerance approach to modern slavery and act ethically and with integrity in all business dealings and relationships.
- **Systems and Controls:** We will implement and enforce effective systems and controls to ensure modern slavery does not occur in our business or supply chains.
- **Transparency and Disclosure:** We are committed to transparency in our operations and supply chains, in line with our obligations under the Modern Slavery Act 2015.
- **Supplier Expectations:** We expect all contractors, suppliers, and business partners to uphold the same high standards, including prohibitions against forced, compulsory, or trafficked labour. We also expect them to ensure their own suppliers meet these standards.
- **Worker Protections:** We guarantee colleagues the freedom to terminate employment and freedom of movement. We prohibit threats, harassment, intimidation, debt bondage, bonded labour, disciplinary work obligations, and compulsory overtime.
- **Victim Support:** Any victims of modern slavery identified within our organisation will be provided access to remedy, compensation, and justice.
- **Recruitment Practices:** We strictly prohibit worker-paid recruitment fees.

Modern Slavery Act 2015

The Modern Slavery Act 2015 is designed to combat modern slavery in the UK and consolidates previous offences relating to trafficking and slavery.

The Act requires large businesses to produce and publish an annual statement setting out the steps taken to prevent modern slavery within their own business and supply chains.

Managing Potential Risk

We manage internal risk through robust recruitment and onboarding processes:

- Application review and interview.
- Eligibility to work (ETW) checks.
- Payment checks and direct payment to individuals.
- Bank account details verification.
- Immediate reporting and rejection if criteria are not met.

Responsibilities and Conduct

- **All Employees, Workers, and Contractors:** Must read, understand, and comply with the anti-slavery and human trafficking statement.
- **Shared Responsibility:** Preventing, detecting, and reporting modern slavery is the responsibility of everyone working for or under the control of the company.
- **Avoiding Breaches:** Staff must avoid any activity that could lead to or suggest a breach of the policy.
- **Reporting Conflicts:** If a conflict with the policy is suspected or occurs, staff must notify their line manager or a Business Unit Executive (BUE) as soon as possible.

Accountability and Oversight

- **Board of Directors and Compliance Team:** Hold overall responsibility for legal and ethical compliance.
- **Compliance Team:** Manages day-to-day implementation, monitoring, and auditing.

- **Management:** Ensures teams understand and comply with the policy and receive regular training.
- **Feedback Encouraged:** Comments, suggestions, and queries should be directed to the Compliance Team.

Raising Concerns and Reporting

- **Early Reporting:** Staff are encouraged to raise concerns or suspicions of modern slavery at the earliest possible stage.
- **Reporting Channels:** Concerns should be reported to a line manager, the HR, People & Compliance Director, the Compliance Team, or via the Whistleblowing Policy.
- **Uncertainty Guidance:** If unsure whether a situation constitutes modern slavery, staff should raise it with their line manager or a BUE.
- **Openness and Protection:** The company supports openness and protects anyone who raises genuine concerns in good faith, even if mistaken.
- **No Retaliation:** No one will suffer detrimental treatment (e.g. dismissal, disciplinary action, threats) for reporting concerns in good faith.
- **Grievance Escalation:** If detrimental treatment occurs, staff should inform their line manager immediately. If unresolved, escalate formally via the grievance procedure.

Escalation Process

- **Immediate Reporting:** Potential victims must be reported to HR immediately.
- **Referral Consent:** Adult victims must give consent before referral to the National Referral Mechanism (NRM).
- **Form Submission:** HR completes and retains the NRM form or submits an MS1 form if consent is not given.
- **Information Sharing:** Forms are sent to the NCA Modern Slavery & Human Trafficking Unit with full details.

Additional Policies

We operate several internal policies to reflect our commitment to ensuring ethical and transparent business conduct:

- **Recruitment and Selection Policy, Recruitment, Induction, Changes & Leavers Policy & Procedures:** Robust recruitment, including eligibility to work checks.
- **Corporate Social Responsibility:** Promotes honest, ethical conduct from staff, contractors, and suppliers.
- **Supplier Onboarding and Monitoring Policy:** Ensures ethical, financial, and operational risks are identified and mitigated through due diligence and ongoing evaluation.
- **Equity, Diversity & Inclusion Policy:** Ensures no candidate or colleague receives less favourable treatment on protected grounds.
- **Whistleblowing Policy:** Protects colleagues making good faith disclosures from detrimental actions.
- **Bribery Act Policy:** Enforces a zero-tolerance approach to bribery and corruption, requiring all business to be conducted ethically, lawfully, integrity.

Suppliers

- **Zero-Tolerance Communication:** All staff engaging suppliers must communicate the company's zero-tolerance approach to modern slavery.

- **Due Diligence:** Suppliers are reviewed for anti-slavery controls, especially for goods from higher-risk regions.
- **Supplier Standards:** Suppliers must:
 - Eradicate modern slavery within their operations.
 - Hold their own suppliers to account.
 - Pay at least the national minimum/living wage.
- **Termination Clause:** Relationships may be terminated if modern slavery is identified.

We assess supply chain risks based on:

- **Country Risk:** Suppliers sourcing from countries with weaker human rights protections may pose higher risks. We engage with them to understand impacts and require evidence of robust anti-modern slavery policies.
- **Business Partnership Risk:** Long-standing contractual partners present minimal risk due to our deep understanding of their operations. All vendors must demonstrate effective policies to prevent modern slavery in their supply chains.

Training and Awareness

- **Induction and Refresher Training:** Training on modern slavery risks is provided during induction and refreshed regularly.
- **Supplier Engagement:** Ongoing engagement with key suppliers ensures they maintain robust anti-slavery policies and procedures.

Breaches of this Statement

Any colleague who breaches this statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate relationships with individuals or organisations working on our behalf if they breach this statement.

Supplier breaches are managed through investigation, corrective and preventative actions, and removal from the preferred supplier list if necessary.

Key Performance Indicators (KPIs) & Effectiveness

We will measure the effectiveness of our anti-slavery actions using KPIs such as:

- Number of supplier audits conducted annually.
- Percentage of staff and suppliers trained on modern slavery.
- Number of incidents or concerns reported and resolved.
- Number of suppliers assessed as high risk and actions taken.
- These KPIs are reviewed annually to drive continuous improvement.

Accessibility

This statement is available in accessible formats upon request, including large print and screen-reader compatible versions, to ensure it is inclusive and usable by all employees and stakeholders.

Board Approval, Signature & Publication

This statement was approved by the Board of Directors and signed by the Chief Executive Officer.

It is published on the company website with a clear link from the homepage.



The statement is reviewed and updated annually, with board minutes retained as evidence.

Evidence & Documentation

To demonstrate compliance, we will maintain:

- Signed and dated statement by the Chief Executive Officer – Board Member.
- Supplier audit reports and risk assessments.
- Records of staff and supplier training.
- Whistleblowing reports and outcomes.
- KPI dashboard or annual report.
- Screenshot/URL of published statement.
- Accessible document versions.

Signed

DocuSigned by:

4322F9024F6043B...

Craig Aston
Chief Executive Officer

Owner Craig Aston	Author Nicola Hyde
Date of last review/update 27/10/2025	Version Number 07
Information Classification Public	