

Anti-Slavery and Human Trafficking Policy

Statement

Celerity Limited (hereafter referred to as 'Celerity', the 'Company', 'we', 'our' and/or 'us') adopts zero tolerance to modern slavery and human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, human trafficking and unlawful child labour, all of which have in common the deprivation of a person's liberty by another, to exploit them for personal or commercial gain.

Celerity is committed to ensuring there is transparency in its activities and in its approach to tackling modern slavery throughout our supply chains.

Celerity is also committed to acting ethically and with integrity in all its 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. We expect the same high standards from all our contractors, suppliers and other business partners. This policy applies to all persons working for or, on behalf of the company in any capacity including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

This statement sets out the steps that are taken by Celerity to mitigate the risk of modern slavery or human trafficking occurring within our company and our supply chain and in doing so, conform to the requirements of the Modern Slavery Act 2015.

We continue to review our policies and processes, with a view to improving our understanding of the risks within our supply chain and the measures we have in place to mitigate those risks.

Celerity regularly reviews its supplier due diligence processes, to ensure compliance with our commitment to helping prevent slavery or human trafficking being present in any part of our business.

Policy

Our Organisation Structure and Supply Chain

Celerity is a privately owned business with 2 physical and 1 virtual office locations, all within the UK. The company is governed by the Board of Directors. Our business comprises of 2 key focus areas: the design and deployment of often complex IT solutions, and the provision of a range of IT services. Our client base covers the public sector, NHS and vertical markets such as finance, defence, manufacturing and energy.

To support these activities, we have a range of suppliers on our vendor database. Most of our suppliers are UK based however, some of these have supply chains extending into countries that may be considered higher risk. Our due diligence measures with our supply chain are regularly reviewed, improved and strengthened. Our current due diligence measures are outlined within this statement.

Policies relevant to the Modern Slavery Act 2015

We are committed to ensuring that there is no modern slavery, human trafficking, or forced labour in our supply chains or in any part of our business. As part of this commitment, we have the following policies within Celerity:

- Modern Slavery Policy
- Whistleblowing Policy
- Anti-Bribery Policy
- Bullying and Harassment Policy
- Recruitment Policy

These policies reflect our commitment to acting ethically, honestly and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our company and within our supply chains. We work to improve and strengthen our policies and work with our suppliers to ensure they are aware of and compliant with their obligations to the Modern Slavery Act 2015.

These policies are regularly reviewed, annually as a minimum.

Due Diligence Measures in Place

We have procedures in place to establish, assess and monitor areas of any potential risk of slavery and human trafficking occurring in our business and our supply chain. We incorporate controls to mitigate or reduce any identified risks. The company commits to protecting whistle-blowers.

We train our employees to recognise the risks of modern slavery in our business and supply chains.

We require all organisations we engage with to ensure their goods, materials, and labour-related supply chains are unambiguous and:

- Fully comply with the Modern Slavery Act 2015.
- Are clear, transparent, accountable, and auditable.
- Are free from ethical ambiguities.

Risk Assessment

Our Supply Chain is risk assessed using the following criteria to assess and manage risks to workers:

- **Country Risks:** Exposure may be greater in global supply chains in countries where protection against breaches of human rights is more limited than in the UK. We have a range of Suppliers, some of whom may procure materials or components from such countries. We work with Suppliers to gain a better understanding of the impact on our Supply Chain. We require our supply chain to demonstrate they have their own, adequate policies and procedures in place to combat all forms of modern slavery in their supply chains.
- **Business Partnership Risk:** Our key contractual Partners are long-standing relationships therefore, involve minimal risk as we have built a good working knowledge of our Partner's operation, policies and practices over many demonstrable years. We require our vendors and partners to demonstrate they have their own, adequate policies and procedures in place to combat all forms of modern slavery in their supply chains.

Training and Awareness

Training and awareness of Modern Slavery and associated risks is provided to all employees, contractors and workers. Training and awareness are provided:

- During staff Inductions.
- Through regular company communications.

We conduct regular communications with our key suppliers, to ensure they have adequate policies and procedures in place to evidence compliance with the Modern Slavery Act 2015.

Continuous Improvement

Celerity understands it has a responsibility to continue to assess and mitigate the risk of Modern Slavery. We will continue to remain vigilant and review our approach to ensure that we have appropriate mitigation in place for any associated risks. The company will not tolerate Modern Slavery in any form within our business, including our wider Supply Chain.

Compliance with the Policy

All employees, workers and contractors must ensure they read, understand and comply with this policy. 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. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Staff must notify their line manager or a company Business Unit Executive (BUE) as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Staff are encouraged to raise concerns about any issues or suspicion of modern slavery in any parts of our business or supply chains of any supplier, at the earliest possible stage. If staff believe or suspect a breach of this policy has occurred or that it may occur, they must notify their line manager or the Business Operations Director, in accordance with our Whistleblowing Policy, as soon as possible.

If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any of our supply chains constitutes any of the various forms of modern slavery, they should raise it with their line manager or a company BUE. 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 resulting from 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 part of our supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If staff believe they have suffered any such treatment, they should inform their line manager immediately. If the matter is not remedied, staff should raise it formally using our grievance procedure, which can be found in the employee handbook.

As an equal opportunities' employer, Celerity is committed to creating and ensuring a non-discriminatory and respectful working environment for its staff. We want all our staff to feel confident that they can expose any form of wrongdoing, including evidence or suspicion of modern slavery, without any risk to themselves.

Responsibility for the Policy

The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Compliance Team 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. 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.



Signed

DocuSigned by:
Jane Evans
52EBFDAACB3F4AB...

Jane Evans
Business Operations Director

Owner Jane Evans	Author Karen Lightfoot
Date of last review/update 02/09/2024	Version Number 06
Information Classification Public	