



celerity

Modern Slavery Statement

2025

A Message From Our CEO

Craig Aston
CEO, Celerity Ltd



At Celerity, we are committed to eradicating modern slavery across our own operations and throughout our supply chains. Our commitment runs deeper than compliance, it's fundamental to who we are.

Modern slavery is a complex problem without simple solutions.

We're approaching it with the same honesty we bring to sustainability: clear about what we know and don't know, committed to continuous improvement.

Our suppliers are integral to our business, and therefore integral to our responsibility. We've implemented supplier codes of conduct that prohibit forced labour, child labour, and exploitation, coupled with risk assessments and contractual requirements for compliance. We're investing in our supply chain monitoring and visibility because getting these right matters more than appearing to have already got them right.

Our Board oversees modern slavery efforts and receives regular updates. We remain committed to transparency and welcome feedback for the future.

Our Organisation

We are a privately owned UK-based IT services company specialising in designing and deploying complex IT solutions and providing a range of IT services to clients in the public sector, NHS, and sectors including finance, defence, manufacturing, and energy. We maintain four offices across the UK: Manchester (Head Office), Preston, Sunderland, and Chester.

We take a zero-tolerance approach to modern slavery and human trafficking in all forms. This commitment extends to our own operations and throughout our supply chains. We recognise that effective prevention requires not only policy commitments, but demonstrable action, continuous improvement and transparent reporting. Our supplier base is predominantly UK-based (approximately 85%), with the remainder sourced from EU countries (10%) and a smaller percentage from countries identified as higher-risk. We assess supply chain risk using recognised indices and government guidance on forced labour, human rights, corruption, and rule of law.

This statement covers Celerity Limited and reflects our commitment under the Modern Slavery Act 2015.

Our Committments



Acting ethically and with integrity in all our business dealings and relationships.



Implementing and enforcing effective systems and controls to ensure modern slavery does not occur in our business or supply chains.



Understanding our supply chains and the risks they present.



Responding **transparently** when issues are identified.



Modern Slavery Risks

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.

We have identified the following areas of our supply chain as presenting elevated modern slavery risk:

- **Cleaning and facilities contractors**, classified as high-risk sector globally.
- **Agency and temporary staff** we engage, particularly in roles with lower bargaining power.
- **Supply chain visibility gaps** where we engage suppliers with sub-contractors.

We regularly review and strengthen our due diligence measures to ensure ethical compliance throughout our supply chain, with annual risk reassessment conducted.

Policies and Governance

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

- Anti-Slavery and Human Trafficking Policy: Governs our internal, zero-tolerance approach to Modern Slavery.
- Recruitment and Selection Policy: Robust recruitment procedures.
- Recruitment, Induction, Changes and Leavers Policy/Procedures: Robust internal procedures, including Right to Work (RTW) 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.
- Supplier Code of Conduct: All suppliers are required to comply with our Code of Conduct.
- Equity, Diversity and 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.

Managing Potential Internal Risk

We manage internal risk through robust recruitment and onboarding processes. All new employees and contractors (including agency workers and interns) undergo these checks prior to starting work at Celerity, with 100% compliance required.

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

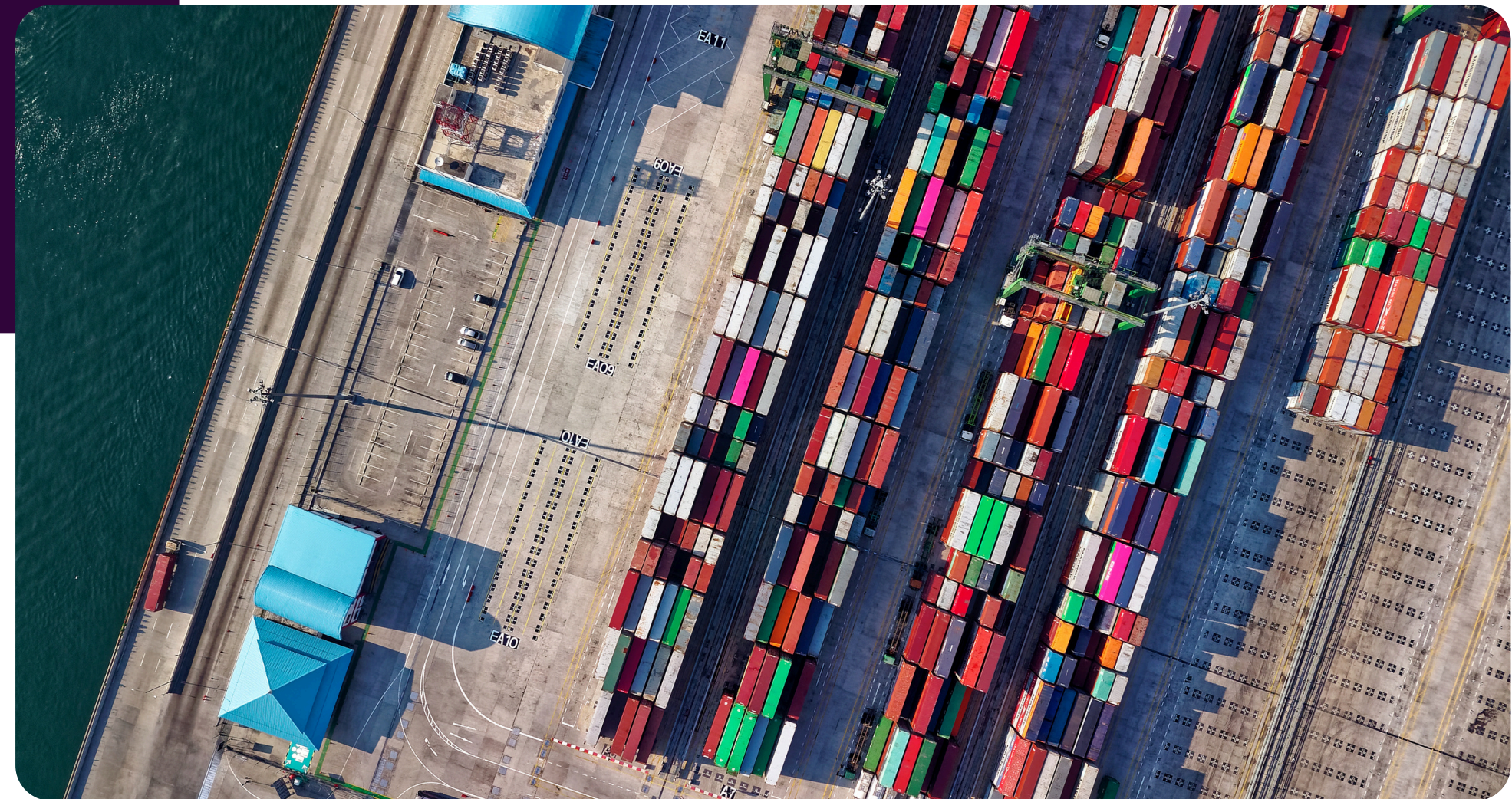


Risk Assessment and Supply Chain Mapping

We will undertake periodic risk assessments to identify areas of heightened exposure to modern slavery, taking into account:

- Geographic Risk.
- Sector and Industry Risk.
- Workforce Characteristics.
- Supply Chain Complexity – including Tier 1 suppliers where reasonably practicable.

We will maintain and continually improve visibility of our supply chains, recognising and transparently documenting any limitations in our current knowledge and the steps being taken to address these gaps.



Due Diligence and Supplier Management



We implement proportionate and risk-based due diligence processes in relation to suppliers and business partners, which may include:

- Pre-engagement checks and onboarding checks.
 - Contractual requirements addressing modern slavery and human trafficking.
 - Ongoing monitoring, including periodic reassessment.
 - Escalation and remediation procedures for identified risks.
- Where risks are identified, the Company will prioritise engagement and remediation, adopting a victim-centred approach, rather than immediate disengagement where this could exacerbate harm.

Monitoring, Effectiveness and KPIs



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

- Number of supplier audits conducted annually.
- Percentage of staff trained in modern slavery.
- Number of incidents or concerns reported and resolved.
- Number of suppliers assessed as high risk and actions taken.

These KPIs are reviewed quarterly by the Compliance Team and annually for strategic planning.

Current targets:

- Staff training completion 100% within 12 months.
- Supplier risk assessment 80%+ of supplier base by end 2027.
- Recruitment compliance 100% of new starters with documented checks.
- Incident response within 5 working days.

Results are tracked to drive continuous improvement.

Training and Awareness

We provide targeted training on modern slavery risks and responsibilities to all staff, including those with roles in:

- Procurement and supply chain.
- HR and Recruitment.
- Higher risk operational areas.

Training is provided at induction (required within 30 days of employment start) and refreshed each year. The course covers understanding of the Modern Slavery Act 2015, learning how to recognise signs of modern slavery and exploitation and how to prevent, identify, report and eliminate modern slavery.

Content is provided remotely by a third party and is updated to reflect changes in legislation, guidance, and risk exposure.

2025 Target Training Completion Rate: 100%

2025 Achieved Training Completion Rate: 90%

We will regularly review and refine our approach to training to help us achieve our target completion rate and to ensure continuous improvement and alignment with evolving regulatory expectations, best practice and customer obligations.



Future Priorities

We recognise that expectations in relation to modern slavery are evolving. We will continue to review and enhance our approach in line with:

- UK Government guidance on transparency in supply chains.
- Emerging international standards and due diligence frameworks.
- Stakeholder expectations, including those of customers, investors, and regulators.

We plan to:

- Improve our supply chain visibility.
- Increase supplier assessments.
- Enhance training and awareness



Responsibilities, Governance and Accountability

Whilst everyone has a shared responsibility in preventing, detecting, and reporting modern slavery, the below points detail our policy responsibilities, governance and accountability:

- **All Employees, Workers, and Contractors:** Must read, understand, and comply with the anti-slavery and human trafficking policy. Staff must avoid any activity that could lead to or suggest a breach of the policy.
- **Board of Directors:** Retain ultimate accountability for ensuring the effectiveness of the Company's approach to modern slavery.
- **Chief Executive Officer (CEO):** Approves the Anti-Slavery and Human Trafficking Policy and annual Modern Slavery Statements.
- **Compliance Team:** Oversight of modern slavery risk management, managing day-to-day implementation, monitoring and auditing and, ensuring integration with the Company's broader risk, compliance, and ESG frameworks.
- **Senior Management (BUEs):** Ensures teams understand and comply with the policy and receive regular training.

Board Approval, Signature and Publication

This statement is approved by the Board of Directors and signed by the Chief Executive Officer (CEO). The signatory certifies that this statement is accurate to the best of their knowledge, and that all material information regarding modern slavery risks and responses has been included.

Our statement is published on the company website within 6 months of the financial year end.

Evidence and Documentation

To demonstrate compliance, we will maintain:

- Signed and dated statement by the Chief Executive Officer.
- Supplier audit reports and risk assessments.
- Records of training.
- Whistleblowing reports and outcomes.
- KPI dashboard or annual report.
- Published statement.