

Digital Modus Ltd
Modern Slavery Statement
DM/107/08



Document Information

Document Control

Version	Date	Author	Comments
0.1	1st February 2022	Nick Howes	Initial Draft
0.2	7th February 2022	Nick Howes	Changes following HR Consulting review
DM/107/03	27th July 2023	Kerry Brannigan	Annual Review, Policies numbered & Google Approval Requested from Directors
DM/107/04	9th January 2024	Nick Howes	Added Signature
DM/108/05	10th January 2024	Magda Marshall	<ul style="list-style-type: none"> • P.3 - more information added about our pre-employment and onboarding checks • P.4 - risk assessments and training/ raising awareness information added • P. 5 and 6 - Due Diligence and Our Commitment paragraphs have been added
DM/108/06	13th February 2024	Magda Marshall	'Our Commitment' paragraph was amended to reflect the fact that Modern Slavery training is compulsory for all staff
DM/107/07	30th June 2024	Kerry Brannigan	Annual Review
DM/107/08	01st August 2024	Magda Marshall	Added two paragraphs: KPIs and Our policies in relation to the Modern Slavery Act 2015 More information added about our due diligence processes. Added sections: Enhancing Supplier Risk Assessment for Modern Slavery Managing the Risk of Debt Bondage in Recruitment Practices
DM/107/xx	30th June 2025		Annual Review

Distribution List

Name	Role
Staff	All Staff employed by Digital Modus must read.
Contractors	All people involved on behalf of a subcontractor contracting with Digital Modus must read.
Suppliers	Shared with Suppliers as part of Digital Modus supplier onboarding.
Customers	Shared with all Customers on request.

Modern Slavery Statement

Introduction

This statement is made in relation to section 54 of the Modern Slavery Act 2015. It details the steps that Digital Modus Ltd. (Digital Modus) has taken—and continues to take—to ensure that modern slavery and human trafficking do not occur within our business or supply chain. This statement details Digital Modus's actions to combat modern slavery in our supply chain from 1 July 2024 to 30 June 2025.

Modern Slavery Definition

The Ethical Trading Initiative (see www.ethicaltrade.org), an umbrella organisation that assists businesses in working and trading ethically, defines modern slavery as a term used to describe several specific issues, including human trafficking, forced and compulsory labour, debt bondage, slavery, servitude, and the worst forms of child labour and slavery.

Digital Modus has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically with integrity and transparency in all business dealings and to establishing effective systems and controls to safeguard against any form of modern slavery within our business or our supply chains.

Our organisation

Digital Modus is a technology company specialising in the provision of professional services, support and software. Our vision is to improve the outcomes of technology stakeholders and make better technology accessible to everyone. We are based in the UK. Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Ethical standards play a crucial role in shaping the culture and operations of our organisation. They are reflected in our recruitment and selection practices, fairness in promotion, compensation, and termination practices, and how we treat and interact with our staff, contractors, suppliers, and customers. We are committed to acting ethically with integrity and transparency in all business dealings. We have policies that support the Modern Slavery Act principles across our business.

In our organisation, we are dedicated to fostering a workplace that is free from discrimination and promotes respect among our employees. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. All employees are made aware of our business policies relating to standards of behaviour that are required from them as part of our comprehensive induction process.

Our policies in relation to the Modern Slavery Act 2015

We ensure we practise the right behaviours throughout the organisation by embedding them into our Staff Handbook, Recruitment & Selection Policy, Equality & Diversity Policy, Whistleblowing Policy and Anti-Bribery & Anti-Corruption Policy.

Our Supply Chain

We are committed to building long-term relationships with key partners who share our ethos and beliefs. When appropriate, we will work with vendors across the globe. We ensure that our partners know of and willingly comply with our position regarding Modern Slavery.

Our supply chains are limited. We procure services from well-trusted and reputable organisations to support our infrastructure.

Digital Modus acknowledges the importance of identifying parts of our business and supply chains where the risk of modern slavery is highest. While our operations are primarily based in the UK, and we assess our overall risk to be low, we understand that certain areas may still pose higher risks. These include:

- **Geographical Risks:** We recognise that suppliers based in certain regions may present a higher risk due to less stringent labour laws or enforcement.
- **Industry-Specific Risks:** Although we primarily operate in the technology and professional services sectors, we monitor potential risks associated with suppliers who might be involved in manufacturing or other higher-risk industries.

We are committed to regularly reviewing these risk areas and taking appropriate steps, such as enhanced due diligence and supplier audits, to ensure modern slavery risks are minimised.

Our onboarding processes for suppliers include the requirement that all our suppliers make several contractual commitments to us as part of the supplier terms and conditions they sign. Under these terms and conditions, suppliers must adhere to all applicable laws regulating child working and bonded labour; must not, under any circumstances or on any basis, engage any person under the age of 15; and must maintain appropriate workplace health, safety and welfare conditions. Our suppliers agree to assist and cooperate with us on any due diligence checks, audits, and inspections that we may undertake to verify their compliance with these commitments.

As a company, we undertake regular risk assessments of our suppliers to mitigate the risk of slavery and human trafficking. We also raise awareness amongst staff on how to recognise and report any suspected cases of modern slavery.

Enhancing Supplier Risk Assessment for Modern Slavery

At Digital Modus, we recognise that a comprehensive approach to assessing the risk of modern slavery within our supply chain is essential. While we already conduct risk

assessments and due diligence checks, we are committed to enhancing our processes to ensure that we identify and address any suppliers who may pose a higher risk.

We take additional steps to ensure our assessments are as robust as possible, including:

- **Conducting Desk-Based Research:** As a foundational step, we conduct detailed research to understand where the highest risks of modern slavery may exist within our supply chain. This helps us engage more effectively with suppliers who may operate in higher-risk regions or industries.
- **Targeted Engagement:** Once higher-risk suppliers are identified, we prioritise engagement with these partners to ensure they fully comply with our ethical standards and are committed to eradicating modern slavery from their operations.
- **Utilising Specialist Tools:** We leverage resources such as the [Responsible Sourcing Tool](#) to enhance our understanding of potential risks and guide our decision-making. These tools provide valuable insights into the conditions that could lead to modern slavery within specific industries or geographical areas.

By strengthening our investigative processes, we aim to ensure that all suppliers are thoroughly vetted and that those presenting higher risks are effectively monitored and supported in meeting our ethical standards.

Our Key Performance Indicators (KPIs)

At Digital Modus, we recognise the importance of measuring the effectiveness of our anti-slavery actions to drive continuous improvement. To this end, we have developed a set of KPIs that align with our commitment to preventing modern slavery across our operations and supply chains.

Our KPIs include:

Training and Awareness

- To monitor the completion rate and effectiveness of mandatory modern slavery training, with a target of 100% completion for all staff.

Supplier modern slavery statement compliance

- To investigate all instances of reported non-compliance.

Grievance and Whistleblowing Procedures:

- To report and investigate 100% of whistleblowing cases made to Digital Modus.
- To monitor and review the outcomes of whistleblowing cases reported by our partners.
- To monitor the number and resolution of reported cases through our whistleblowing channels, with a focus on timely and appropriate responses.

Policy compliance

- To ensure a modern slavery statement is in place and is reviewed and updated annually as a minimum.
- To ensure our Recruitment & Selection Policy, Equality & Diversity Policy, Whistleblowing Policy and Anti-Bribery & Anti-Corruption Policy are being reviewed and updated annually as a minimum.

Procurement

- To carry out due diligence on new contracts, including confirmation for large contracts (over £500K), that organisations have suitable Modern Slavery statements available indicating their commitments in this area

Supplier Oversight

- To track the visibility and compliance of suppliers, particularly those in higher-risk regions or industries, to ensure they adhere to our ethical standards.

We also ensure that senior management regularly reviews these KPIs to evaluate their relevance and practicality, allowing us to adjust our approach as needed.

Managing the Risk of Debt Bondage in Recruitment Practices

Digital Modus prioritises direct recruitment as our preferred method of talent acquisition.

We recognise that indirect methods of recruitment can create opportunities for modern slavery due to the absence of direct oversight by our organisation. Recruitment intermediaries may exploit workers through practices like charging worker-paid recruitment fees, which can lead to debt bondage. We are committed to ensuring that all recruitment practices within our business and supply chain are free from such exploitative practices.

We understand that debt bondage can occur not only through recruitment fees but also when workers are burdened with debts related to accommodation, healthcare, or other services provided by employers. Additionally, workers may be trapped in debt due to private loans, often exacerbated by inadequate pay and limited access to essential services.

To mitigate these risks, we are taking proactive steps by:

- Conducting thorough due diligence on all recruitment agencies and suppliers to ensure they comply with ethical recruitment standards, with a specific focus on avoiding worker-paid recruitment fees.

For further guidance on responsible recruitment practices, we refer to industry resources such as Verite's Fair Hiring Toolkit for Suppliers, Verite's Fair Hiring Toolkit for Brands, and the [IHRB's Guide to Implementing the Dhaka Principles](#). These resources provide valuable

insights on how businesses can implement ethical hiring practices and protect workers from exploitation.

Due diligence

Employees, contractors, and other business partners are encouraged to report any concerns related to the direct activities, or the supply chains of Digital Modus in line with our Whistleblowing policy. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Reports can be made to Magda Marshall, HR Business Partner via [email](#).

We hope that staff will feel able to voice any concerns openly as confidential disclosures can be difficult to investigate. However, should they choose to lodge any concerns anonymously, they can do so by completing the [Modern Slavery Reporting form](#).

Any concerns raised will be investigated without any undue delay.

When specific instances of modern slavery have been uncovered in the supply chain, they must be addressed immediately and in a manner that is proportionate and adapted to the circumstances of the case.

Our commitment

- We are an accredited Living Wage employer and Living Hours employer.
- Our employees undergo robust pre-employment checks and are vetted to the BS7858 standard as a minimum. Many are Security Check (SC) cleared.
- All our staff are required to undertake the CPD-accredited 'Modern Slavery' awareness training.
- Our business is accredited with ISO 9001, 27001 and 14001.



Nick Howes
CEO
Digital Modus Ltd
16th August 2024