Modern Slavery Policy

Version: 1.0

Document Control

Revision History

Date	Version	Description	Author	Email
24/09/2024	1.0	Initial Version	Shafee	Shafee70@me.com

Table of Contents

1 Introduction

1.1 Purpose

At **Welford Systems Limited**, we are committed to upholding the highest ethical standards in all areas of our business. As an IT service consultancy specializing in Cloud Computing, Cybersecurity, and Identity & Access Governance, we recognize the importance of maintaining integrity and transparency throughout our operations, including our responsibility to combat modern slavery, human trafficking, forced labor, and other forms of exploitation.

Although we operate in the technology sector, where modern slavery risks may not seem as prevalent as in other industries, we are fully aware that slavery, servitude, forced labor, and human trafficking can affect any part of the global economy, including the supply chains for technology services and products. As such, we are committed to ensuring that our business and all relationships in our supply chains are free from these inhumane practices.

This policy demonstrates our zero-tolerance approach to modern slavery, and it outlines the steps we are taking to safeguard against any such activities in our operations and supply chains. We expect all employees, suppliers, contractors, and partners to adhere to the principles set out in this policy to ensure ethical and responsible practices across our business.

1.2 Scope

This policy applies to all aspects of Welford Systems operations, including the provision of our specialized IT services in Cloud Computing, Cybersecurity, and Identity & Access Governance. It extends to all employees, contractors, consultants, suppliers, service providers, and any other third parties engaged in business activities with Welford Systems. We are committed to ensuring that our partners and suppliers adhere to the same high ethical standards that we uphold internally.

We recognize that, while modern slavery risks may not directly impact the technical services we provide, the complexity and global nature of the IT supply chain, including hardware, software, and subcontracted services, can potentially expose us to risks associated with forced labor and human trafficking.

2 Our Commitment

We are committed to:

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

- Implementing and enforcing effective systems and controls to minimize the risk of modern slavery within our business and supply chains.

- Complying with all applicable legislation, including the UK Modern Slavery Act 2015.

- Continuously reviewing and improving our practices to combat modern slavery.

2.1 Zero-Tolerance Approach

We maintain a zero-tolerance approach to slavery, servitude, forced labour, and human trafficking. We will not knowingly engage with any individual or organization that participates in such practices. If evidence of such activities is discovered within our business or supply chain, we will take immediate action, which may include terminating relationships, reporting to relevant authorities, or supporting victims where appropriate.

2.2 Supplier Code of Conduct

All suppliers must adhere to our Supplier Code of Conduct, which explicitly prohibits any form of forced, bonded, or involuntary labour. Suppliers are required to:

- Demonstrate compliance with local laws on labour and human rights.

- Ensure workers are not subject to threats, coercion, or forced labour conditions.

- Guarantee that no one under the age of legal employment works within their organization.

- Provide fair wages, safe working conditions, and respect workers' rights.

We reserve the right to audit and monitor suppliers' adherence to these standards. Suppliers who fail to meet these expectations may face the termination of contracts.

2.3 Due Diligence

To mitigate the risk of modern slavery within our business and supply chains, we implement the following due diligence measures:

- Conduct risk assessments to identify areas of potential vulnerability to modern slavery.

- Engage with suppliers to ensure transparency and accountability in their operations.

- Review contracts with suppliers and partners to ensure they comply with our standards on ethical labour practices.

3 Reporting & Governance

Any employee or stakeholder with concerns about modern slavery within Welford Systems or our supply chains is encouraged to report these concerns confidentially through our established reporting channels. We will investigate all reported concerns and take appropriate action to remedy any issues identified.

The Board of Directors of Welford Systems is responsible for overseeing this policy and ensuring its implementation. Senior management is tasked with ensuring that all aspects of the policy are upheld, including its integration into business practices and supplier management.