Modern Slavery Statement 2026-27

Introduction
Ingeus UK Limited is fully committed to the requirements of the Modern Slavery Act 2015 and appreciates the significance of continually developing and improving our practices under these requirements. We have, and will, take a proactive approach to preventing modern slavery or human trafficking, and be strong in our reactions if any concerns are identified.

About Ingeus
We help governments, employers, and local partners design and deliver services to solve complex challenges caused by social and technological change. Our services improve opportunities and help create strong societies in which people have the independence, knowledge, and know-how to thrive.

Every day our teams across the UK help people improve their skills, employment, health and wellbeing. We're purpose-led, passionate and proud to work with customers and communities to drive social change.

We deliver people services that enable the better lives of the individuals that access them.
These include the following:
– support for unemployed participants, helping them to overcome barriers to find employment
– completion of health assessments that support claimants to access benefits
– services that help offenders transform their lives, break the cycle of re-offending and create safer communities.

About our supply chain and due diligence
We are supported to deliver services by a range of supply chain partners. These organisations are predominately people services organisations, local authorities and third sector (charitable) bodies.

We complete due diligence with our partners prior to service commencement and then on annual basis. This process includes a review of their employment practices as well their own approaches to safeguarding and modern slavery. We assess the risk of slavery and human trafficking to be low in these organisations.

We also procure services from a range of other businesses that support our delivery. These include contractors, IT suppliers, facilities management organisations and utility providers. These are predominately UK based organisations where we assess the risk of slavery and human trafficking to be low. We undertake an annual review of these organisations to assess their processes and feed the information into our own risk assessment.

Steps taken to identify and eliminate the risk of modern slavery or human trafficking
- Completion of an annually reviewed Modern Slavery Risk Assessment
- Implementation of a Safeguarding Policy that sets out the legislative requirements regarding our duty of care towards staff and participants and provides a clear reporting process for any identified safeguarding concerns. This includes any issues related to modern slavery or human trafficking.
- Implementation of a Modern Slavery Prevention and Reporting procedure which includes how to escalate any identified concerns relating to our supply chain and programme participants.
- Implementation of mandatory staff Modern Slavery training during induction and as part of annual refresher programme.
- Implementation of a Staff Code of Conduct that ensures employees are aware of responsibilities and ethical behaviours, required for the effective and appropriate delivery of services. It refers to our company values, human rights and duty of care.

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- Implementation of an Equality and Diversity Policy that ensures we treat staff and participants with dignity and respect, irrespective of their protected characteristics. It also details how to take appropriate action if this is not occurring.
- Implementation of an Equality, Diversity and Inclusion forum, which comprises of key colleagues across the business, this group reviews all aspects of our service delivery and operations to ensure we are truly inclusive.
- Implementation of a safeguarding forum: that shares best practice and reviews issues related to safeguarding and modern slavery.
- Assessment of the right of all staff to work in the UK in accordance with legal requirements.
- Staff personal wellbeing reviews. Line managers undertake regular 1:1s to assess their personal wellbeing.
- Completion of participant ID checks. All participants accessing our services are required to provide appropriate identification documentation at the start of their programme. Concerns are reported through the Modern Slavery Prevention and Reporting procedure.
- Annual completion of the HM Govt. Modern Slavery assessment: We have completed this tool to determine our position against the assessment criteria. This has identified areas for improvement that we are reviewing and seeking to develop through 2027.

Our Key Performance Indicators:

- All staff to be trained during induction and then annually.
- Complete due diligence of supply chain delivery partners prior to contract and then annually.
- Assessment of all suppliers' modern slavery practices on an annual basis
- Review and update our modern slavery and human trafficking policy and statement annually.

Modern Slavery Management

Ingeus has appointed a senior manager to lead policy and practice across our organisation

- Brian Sullivan, Head of Risk and Compliance
- Email bsullivan@ingeus.co.uk
- Mobile 07957904322

Approved

Fiona Monahan
Chief Executive
October 2026