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Modern slavery and human trafficking.

Governance, risk, and compliance (GRC)

Published regulatory statement



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Document control

The version of this document cancels and replaces the previous version, which should be removed from circulation.

Document information

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Document authorisation

Approval	Role	Name
Approver	Group CEO	John Petter
Reviewer(s)	Company Secretary	Chris Fox
	Director of Risk and Compliance	Neville Cotton
Process Owner and Author	Director of Risk and Compliance	Neville Cotton

Document history

Version	Description	Date
3	Rewrite of the annual statement with substantial enhancements. Cancels and replaces all previous versions. Shifting to new version and document control structure. Submission to the Home Office public register. Review of statement with amends by Alistair Scott, alignment to brand and tone, and optimisation for website publication.	06 Aug 2021
4	Annual statement update incorporating performance outcomes over the past 12 months	05 Aug 2022
5	Annual statement update and transfer to new branded group template	03 Aug 2023
6	Reviewed and updated for FY2024 statement and disclosure.	05 Aug 2024
7	Reviewed and updated for FY2025 statement and disclosure.	28 Aug 2025
8	Reviewed and updated for FY2026 statement and disclosure. Updated external references. Addition of Hastee.	30 Sept 2026

References

External references

The modern slavery and human trafficking statement is documented in compliance with the following principal international standards and regulatory requirements.

Reference	Title
UNTOC	United Nations Convention against Transnational Organised Crime (UNTOC)
UNCAC	United Nations Convention Against Corruption (UNCAC)
UNGPs	United Nations Guiding Principles on Business and Human Rights (UNGPs)
FATF	Financial Action Task Force, predicate offences and recommendations applicable to modern slavery and human trafficking
UNGC	United Nations Global Compact
ILO	International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights of Work
POCA2002	Proceeds of Crime Act 2002
MLR2017	The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
s54(1)	The Modern Slavery Act 2015 UK Home Office Transparency in Supply Chains Guidance.
Human Trafficking Act 2013 (Ireland)	Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013
Articles 23-24	The Constitution of India
Child and Adolescent Labour Amendment Act 2016	Child Labour (Prohibition and Regulation) Act, 1986, as amended by the Child and Adolescent Labour (Prohibition and Regulation) Amendment Act 2016 (India)
Article II. Declaration of Principles and State Policies, section 1, 3, 6, 18	Philippines Constitution 1987

Reference	Title
Government registry	Home Office, public register of Modern Slavery and Human Trafficking Statement. Guidance on statements: transparency on indicators of modern slavery applicable to the business, prioritisation of activity where we can make a difference, demonstrate progress against targets on: • Structure • Supply chains • Policy • Due diligence processes • Risk assessment • Measuring effectiveness • Training

Associated internal documents

The associated internal documents should be read, reviewed, and updated whenever there is a change to the Modern Slavery and Human Trafficking Statement

Document Reference	Name of Document
Primary Framework	FWK0008 Economic Crimes
Supporting Frameworks	FWK0002 Corporate Governance FWK0003 Enterprise Risk Management Framework
Primary Policy and Minimum Requirements	Modern Slavery and Human Trafficking
Supporting Policies and Minimum Requirements	PMR Code of Conduct and Ethics PMR Anti-Money Laundering PMR Anti-Bribery and Corruption PMR Economic Crime Prevention PMR Sustainable Procurement PMR Supplier Assurance PMR Speak Up and Whistleblowing PMR Supplier Code of Conduct and Ethics
Statutory and Regulatory Training Content	Annual Compliance Training – Modern Slavery and Human Trafficking
Reporting	Annual Report and Accounts

Terms and definitions

Terms and definitions defined by the internationally recognised standards which our frameworks align are applied throughout our documentation.

Refer to the independent list of terms and definitions within the *GRC Manual*.

Scope

The scope of the Modern Slavery and Human Trafficking Statement is applicable to the Zellis Group of Companies (Zellis Group) which includes:

Zellis Holdings Limited			
Zellis	Moorepay	Benifex	Hastee
Zellis UK Limited	Moorepay Limited	Benifex Limited	Hastee Benefits Ltd
Zellis Ireland Limited	Moorepay Compliance Services Limited	Benifex Financial Solutions Limited	Hastee HR Ltd
Zellis HR India Private Limited	Natural HR Limited	Benifex Payments Limited	Hastee Technologies HR Ltd
Elementsuite Limited	Moorepay Ireland Limited	Benefex Philippines Inc	
	Buddy UK Operations Ltd	Wrkit Limited	
		Cloud 8 Limited	

Zellis Group modern slavery and human trafficking statement

Modern slavery and human trafficking have no place in our business or supply chains. As a leading provider of payroll, HR, employee benefits and financial wellbeing services, Zellis Group recognises both its responsibility to uphold fair and safe working practices and the important role our services can play in helping to protect workers from exploitation.

We are committed to mitigating modern slavery risks across our operations and supplier relationships. During the year, we continued to strengthen our risk-based supplier assurance, employee training and governance arrangements, while maintaining clear routes for concerns to be raised and investigated. This statement summarises the steps we have taken, the progress made and the areas in which we will continue to improve.

John Petter
Group Chief Executive Officer

30 September 2026

This is Zellis Group's eighth annual modern slavery and human trafficking statement and is made in accordance with section 54 of the *Modern Slavery Act 2015*. It covers the financial year 2025/2026.

About Zellis Group

As the leading provider of payroll and HR solutions for UK and Ireland-based organisations, Zellis Group delivers a range of specialist products and services through its four core brands: Zellis, Moorepay, Benifex and Hastee. In total, Zellis Group currently has a team of circa 3,277 expert employees across the UK, Ireland, Sweden, Spain, Malta and India.

Zellis provides award-winning payroll and human capital management (HCM) software in the form of its flagship product, ZellisOne. It is also the trusted managed services partner to more than 120 customers, delivering complex payroll, HR, background checking, and consultancy requirements from dedicated service centres across three geographies.

Founded in 1966, Moorepay provides payroll and HR solutions to small and medium-sized organisations in the UK and Ireland. With over 500 qualified staff, the company delivers its own distinct software and managed service offerings, tailored to the needs of SMEs. Its specialisms include employment law consultancy and health and safety services among others.

Benifex has a singular purpose: to improve the lives of millions of employees by building better benefit experiences that people love. Benifex supports nearly 5 million employees in 3,000 global organisations across the UK, USA, Europe, and South-East Asia. Benifex's OneHub platform enables customers to design, manage, and deliver meaningful employee experiences, from benefits and communications to reward, recognition and wellbeing, all in one place.

Hastee is a Spanish based financial wellbeing provider that helps organisations improve employee financial health through earned wage access, payroll savings, financial education and money management tools. Hastee's technology integrates with payroll systems to give employees greater control over their finances while helping employers improve engagement, retention and overall wellbeing.

Our policy and ongoing commitment

The Zellis Group of companies takes the ongoing issue of modern slavery, human trafficking, forced and bonded labour very seriously and is committed to the global effort to combat it. We are committed to upholding these principles within our own operations and supply chains and to considering how our products and services can support the responsible employment practices of our customers.

We recognise that payroll, salary payment and employee benefit services could potentially be misused to facilitate or conceal worker exploitation, including the diversion or withholding of wages. Our systems and controls are designed to identify and escalate unusual or suspicious activity as part of our wider economic crime risk strategy – such factors may also indicate modern slavery, forced labour, human trafficking or financial exploitation. Any concerns are assessed and reported through the appropriate internal and external channels.

Our policies and supplier standards reflect relevant principles contained in the *International Labour Organisation's Declaration on Fundamental Principles and Rights at Work*, and the *United Nations Convention Against Corruption*. To further our commitment, Zellis Group subscribed to the *United Nations Global Compact (UNGC)*. This has formalised our position on employment rights.

We uphold people's right to have the freedom to terminate their employment with us, enjoy freedom of movement, and freedom of association. We therefore do not prevent any employee from joining any trade union. Our working practices are designed to support employee welfare and a workplace free from violence, harassment and intimidation.

We prohibit child labour, forced or bonded labour, compulsory overtime, worker-paid recruitment fees, and all forms of discrimination. We proudly promote equality, diversity, and inclusion within the workplace because everyone matters.

Risk assessment

We assess modern slavery risk across our own operations and supply chain using geographic, sector, workforce and supplier-specific indicators. Our direct workforce risk is considered relatively low, reflecting the nature of our business, our employment model and the jurisdictions in which we principally operate. However, we recognise that potential exposure may arise through contingent labour, recruitment and facilities services, outsourced activities, technology and equipment suppliers, and lower tiers of our supply chain.

Modern slavery risk is managed through the Group's enterprise risk management framework and relevant people, procurement, supplier-assurance and economic-crime controls. Risk-based due diligence is undertaken when suppliers are onboarded and periodically thereafter, with enhanced assessment and oversight applied where higher-risk indicators are identified. Group-wide training, monitoring and established reporting routes support colleagues in recognising and escalating potential concerns, while emerging risks are reviewed so that our controls can be strengthened where appropriate.

Due diligence

We have reviewed the adequacy of our governance structure in accordance with our document management processes and are satisfied our commitment, policy, and operational provisions meet requirements.

We have continued to develop our education and awareness programme, aligning the messaging to the specific nature of our business, as well as highlighting the extent of the global exposure and the volume of victims in modern slavery. Whilst the risk exposures are low due to the nature of our business and core services, we are committed to making sure our employees stay alert and know what to do, should they identify any suspicious activity.

Our performance

Last year, we enhanced our visibility and profiling of the supply chain through our supplier assurance programme with new software. Technological advancements remain a focus area. We have further developed scenario-based training modules, and our employees remain engaged and committed.

Modern slavery and human trafficking reporting metrics

We have integrated internal controls into our control environment and established appropriate reporting metrics into our ERM framework. We have also incorporated modern slavery reporting metrics into the *MLRO Annual Report* received by Zellis Group board audit and risk sub-committee.

During this financial year 100% of suppliers onboarded were assessed and 100% of colleagues successfully completed modern slavery training, which is mandated on an annual basis.

No confirmed instances of modern slavery were identified through the Group's reporting and due-diligence processes during the financial year.

Supply chain management enhancements

During the reporting period, we conducted supplier assurance in accordance with our planned schedule. Our supplier assurance and due diligence programme incorporates the assessment of

modern slavery exposures. We have continued to analyse our supply chain to understand and mitigate risks relating to modern slavery, human trafficking, and child labour vulnerabilities. Suppliers are subject to proportionate, risk-based due diligence at onboarding and periodically during the relationship, with enhanced assessment applied where higher-risk indicators are identified

If any risks pertaining to modern slavery were to be identified within our supply chain, we would set clear requirements to provide appropriate safeguards and establish clear reporting routes for ongoing monitoring. We have no appetite to engage suppliers where the risk of Modern Slavery is not appropriately managed.

Next steps

- We will continue developing and enhancing our education and awareness programme to support a proactive stance towards the identification, prevention and reporting of modern slavery and human trafficking cases.
- We will review governance arrangements to identify opportunities to strengthen the design of controls within relevant products that may support the detection and prevention of modern slavery.

Timeline of events

Reporting Period	Description
FY2025 – 2026	Our policy and performance outcomes were reviewed, updated and reported, including the commitments we have set for the next financial year. A new screening platform has been implemented to enhance the assessment of risk across our customers and supply chain. As the Group continues to grow through both organic expansion and acquisitions, we remain committed to maintaining vigilance and strengthening our approach through the ongoing development of best practices to prevent and mitigate this type of crime.
FY2024 – 2025	Our policy and performance outcomes were reviewed, updated and reported, incorporating our commitments for the next financial year. A new screening platform has been put in place to support assessing risk in our customers and supply chain for the group. As the group grows through natural growth and acquisition, we will continue to stay vigilant, continuing to develop best practices against this crime.
FY2023-2024	Our policy and performance outcomes were reviewed, updated and reported. We incorporated next steps for the next financial year. We continue developing best practices and play our part in combatting against this global and domestic problem.
FY2022-2023	Our policy and performance outcomes were reviewed, updated, and reported, incorporating our commitments for the next financial year. We continue developing our digital supply chain mapping. We subscribed to the UN Global Compact and enhanced our financial crime prevention provisions as well as our people policies.

Reporting Period	Description
FY2021-2022	Our policy and commitments adjusted, and we updated our performance outcomes towards the commitments made last year, as well as confirming our commitments for the next financial year.
FY2020-2021	Aligned our modern slavery and human trafficking statement to FATF recommendations, ILO, and UNCAC. Enhanced training to align with identifying signs of modern slavery and human trafficking through our internal control system. Increased awareness on reporting suspicious activity.
FY2019-2020	Modern slavery and human trafficking statement enhanced
FY2018-2019	Modern slavery and human trafficking statement established and published

