



Modern Slavery and Human Trafficking Statement

2023 - 2024

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 01 April 2023 and 31 March 2024.

The statement sets down Fox & Associates Consulting Ltd's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Fox & Associates Consulting Ltd which are as follows:

Since 2009, we've provided consulting and advisory services in the digital and ICT sectors in the UK. We advise and lead the development, deployment and governance of enterprise information systems and digital technology solutions for local and central government agencies, charities and the private sector. We provide diverse, multi-disciplinary teams for private and public-sector clients on projects ranging from discreet, one-off solutions for local authorities and corporations through to multi-million Pound, national government / enterprise scale implementations.

We are a small, privately-held limited company based in northern England.

The Company currently operates in the UK only.

The following is the process by which the Company assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking:

- We have a preference for dealing with suppliers from the UK in the first instance, and where products need to be sourced offshore, countries which are signatories to the relevant international conventions and which have legislation that repudiates slavery and human trafficking.

- We always check that any suppliers we use to support our business are compliant with their country's relevant legislation and covenants. Where we are unable to find evidence of this, we do not deal with those suppliers.
- We actively avoid suppliers and/or countries which are known to support slavery and human trafficking, or have recognized poor records for the elimination of same.

We have determined that none of our activities are at high or even medium risk of modern slavery or human trafficking. The greatest likelihood of inadvertently supporting Modern Slavery and Human Trafficking is through procurement of products that are produced in countries with poor employment and human rights conditions.

Responsibility for the Company's anti-slavery initiatives is as follows:

- Policies: Business Operations Director is responsible for creating and reviewing policies.
- Risk assessments: Business Operations Director is responsible for risk assessments in respect of human rights and modern slavery.
- Due diligence: Business Operations Director is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to be given training and awareness in Modern Slavery and Human Trafficking.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships. The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 **Whistleblowing policy** - The Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Employee Code of Conduct** - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- 2.3 **Corporate Social Responsibility (CSR) Policy** - The Company's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners; evaluating the modern slavery and human trafficking risks of each new supplier; seeking assurance from the partner or supplier that they do not support or engage in modern slavery and/or human trafficking.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Company Directors endorse this policy statement and are fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Peter Fox

Position: Director, Business Operations

Date: 01 April 2023

Signature:

