

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. Introduction

This Statement is published by Project People Limited (the “Company”) pursuant to section 54 of the Modern Slavery Act 2015. It sets out the steps the Company has taken during the current financial year to prevent modern slavery and human trafficking in its own business and its supply chains, and is approved by the board of directors.

The Company has a zero-tolerance approach to modern slavery in any form, including forced, bonded or compulsory labour, human trafficking, servitude and child labour. We are committed to acting ethically and with integrity in all business relationships and to implementing effective systems and controls to safeguard against modern slavery taking place anywhere in our business or supply chains.

2. Organisation Structure and Business

Project People Limited is a UK-registered provider of specialist workforce and consultancy services to the telecommunications and technology sectors. The Company engages employees, temporary workers and subcontracted personnel, and procures goods and services from a supply chain that includes recruitment suppliers, technology vendors, facilities providers and specialist subcontractors, both in the UK and internationally.

Given the nature of workforce supply and recruitment activity, the Company recognises that labour exploitation risk is inherent to elements of its sector and treats this as a heightened area of due diligence.

3. Our Policies

The Company operates a suite of policies relevant to modern slavery risk, which are applied consistently across the business and, where contractually appropriate, flowed down to suppliers and subcontractors:

- Subcontractor Selection and Control Policy and Procedure — requires modern-slavery due diligence before any subcontractor is appointed.
- Subcontractor Selection Criteria Standard — includes labour-model, recruitment-fee and worker-welfare criteria as part of formal evaluation.
- Subcontractor Financial Stability Assessment Procedure — identifies financial distress that can increase labour-exploitation risk in a supply chain.
- Whistleblowing and Grievance Mechanism Policy — provides a confidential route for workers, suppliers and third parties to raise modern-slavery concerns without fear of retaliation.
- Equity, Diversity and Inclusion Policy — sets standards for fair and lawful treatment of the workforce.
- Sustainable Procurement Strategy and the Sustainable Procurement Implementation and Evidence Policy and Framework — embeds human-rights due diligence into procurement decision-making.
- Anti-Bribery, Corruption and Economic Crime Policy — addresses the corruption risks that frequently accompany labour exploitation.

value. Higher-risk indicators include recruitment through third-party labour agencies, cross-border worker placement, lower-tier subcontracting, cash-based payment models, and operations in countries with weaker labour-rights enforcement.

Before appointment, subcontractors and labour suppliers are assessed against modern-slavery criteria as part of the standard due-diligence gate described in the Subcontractor Selection and Control Policy and Procedure, covering:

- prohibition of forced, bonded and child labour;
- responsible recruitment practices and prohibition of worker-paid recruitment fees;
- lawful wages, working hours and rest periods;
- retention of workers' identity documents (prohibited unless lawfully justified and reversible at the worker's request);
- freedom of movement and freedom to terminate employment;
- accessible and safe grievance and reporting channels; and
- visibility and control over lower-tier sub-suppliers.

Contracts with subcontractors and labour suppliers include modern-slavery compliance obligations, audit rights, and a right to terminate for material non-compliance or refusal to cooperate with an investigation.

5. Recruitment Practices

The Company operates a direct-employment and controlled agency-worker model. Recruitment agencies used by the Company must be appropriately licensed (including, where applicable, under the Fair Work Agency gangmaster licensing regime), must not charge work-finding fees to workers, and must be able to evidence right-to-work checks, fair pay practices and worker welfare standards on request.

6. Training and Awareness

Relevant employees — including those in procurement, subcontractor management, HR and compliance roles — receive training to help them recognise the signs of modern slavery and human trafficking and understand how to escalate a concern. Training is refreshed at least annually, and content is updated to reflect emerging risk indicators and regulatory guidance.

7. Reporting and Remediation

Concerns relating to modern slavery or human trafficking, whether involving the Company's own workforce or its supply chain, can be raised confidentially through the channels set out in the Whistleblowing and Grievance Mechanism Policy, including an option for anonymous reporting. All reports are investigated, and, where credible concerns are identified, the Company will pursue remediation for affected workers in preference to immediate termination of the relationship, save where the severity of the conduct or an imminent safety risk requires immediate exclusion.

8. Effectiveness — Key Performance Indicators

The Company measures the effectiveness of its modern-slavery controls through indicators that will be reported year-on-year, including:

- proportion of new subcontractors and labour suppliers screened for modern-slavery risk before appointment;
- number and proportion of employees completing modern-slavery training;
- number of modern-slavery concerns raised through whistleblowing channels and their resolution status; and
- number of supply-chain relationships exited or subject to remediation plans for modern-slavery concerns.

The Company has published Modern Slavery and Human Trafficking statements annually since 2019. The company will continue to report available data against these indicators year on year and use the results to assess the effectiveness of its modern slavery controls and identify areas for improvement.

9. Governance and Approval



Signed on behalf of the Board of Directors.

Name:	Pank Koria
Position:	Managing Director
Date:	4th September 2026
Signature:	Pank Koria

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