

Modern Slavery Statement for Signifyc Ltd - trading as Open Consulting™

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Signifyc Ltd - trading as Open Consulting™ has taken during the reporting period to ensure that slavery and human trafficking are not taking place in our supply chains and in any part of our own business.

Signifyc Ltd - trading as Open Consulting™ is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our organisation or our supply chains.

1. Our Policies in Relation to Modern Slavery

Signifyc Ltd - trading as Open Consulting™ has a zero-tolerance approach to modern slavery and human trafficking. Our commitment is embedded within our core values and is further reinforced through our policies, which apply to all our operations, both domestically and globally, as well as our entire supply chain. These policies include the following provisions:

- **Freedom of Workers to Terminate Employment:** All workers have the right to terminate their employment with Signifyc Ltd - trading as Open Consulting™ or our suppliers in accordance with applicable laws and contractual agreements. There shall be no penalties or restrictions that prevent a worker from leaving their employment freely.
- **Freedom of Movement:** All workers have the right to freedom of movement during their employment and are not restricted from leaving their workplace or accommodation outside of working hours.
- **Freedom of Association:** We respect the rights of workers to form and join trade unions or other worker representative groups of their own choosing and to bargain collectively in accordance with local laws and regulations.
- **Prohibition of Violence, Harassment and Intimidation:** Signifyc Ltd - trading as Open Consulting™ strictly prohibits any form of violence, harassment, intimidation, or threats against workers in our operations and supply chains. We are committed to providing a safe and respectful working environment for everyone.
- **Prohibition of Worker-Paid Recruitment Fees:** We are committed to ensuring that workers are not charged any fees or costs associated with their recruitment or employment. We actively work with our suppliers to eliminate the practice of worker-paid recruitment fees throughout our supply chain.

- **Prohibition of Compulsory Overtime:** Overtime work must be voluntary and compensated in accordance with applicable laws and regulations. We do not permit the use of forced or compulsory overtime.
- **Prohibition of Child Labour:** Signifyc Ltd - trading as Open Consulting™ strictly prohibits the use of child labour in any part of our operations or supply chains. We adhere to the minimum age conventions of the International Labour Organization (ILO) and applicable national laws.
- **Prohibition of Discrimination:** We are committed to providing equal opportunities and a workplace free from discrimination based on race, colour, sex, religion, political opinion, national extraction, social origin, age, disability, or any other protected characteristic.
- **Prohibition of Confiscation of Workers' Original Identification Documents:** We strictly prohibit the confiscation or withholding of workers' original identification documents, such as passports or identity cards, by employers or recruitment agencies. Workers have the right to retain control of their personal documents.
- **Access to Remedy, Compensation and Justice for Victims of Modern Slavery:** Signifyc Ltd - trading as Open Consulting™ is committed to providing access to effective remedy, compensation, and justice for any victims of modern slavery identified within our operations or supply chains. We will work with relevant authorities and organisations to support victims and ensure appropriate action is taken.

2. Training on Modern Slavery

During the period covered by this statement, Signifyc Ltd - trading as Open Consulting™ has provided training on modern slavery to the following groups:

- **Whole Organisation:** All employees across Signifyc Ltd - trading as Open Consulting™ have received awareness training on modern slavery to ensure a general understanding of the risks and how to identify potential issues. This training was delivered through online modules, company-wide presentations.
- **Front Line Staff:** Employees in roles with direct interaction with workers or the public, such as security personnel, site managers, have received more detailed training on identifying and reporting potential indicators of modern slavery. This training was conducted through in-person workshops, targeted online modules.
- **Human Resources:** Our Human Resources team has received comprehensive training on modern slavery and human trafficking, focusing on fair recruitment practices, worker rights, and grievance mechanisms. This training was delivered through internal expert sessions.

- **Executive-Level Staff:** Members of our executive leadership team have received specific training on their responsibilities in preventing and addressing modern slavery within the organisation and its supply chains. This training was provided through dedicated briefings, executive workshops.
- **Procurement Staff:** Our procurement team has received detailed training on identifying and mitigating modern slavery risks within our supply chains. This training covered topics such as due diligence processes, supplier audits, and contractual clauses related to labour standards. This training was delivered through specialized online modules, collaborative workshops with ethical sourcing experts.
- **Suppliers:** We have engaged with our key suppliers to provide them with information and resources on modern slavery, including our expectations and requirements for labour standards. This engagement was facilitated through supplier webinars, distribution of guidance documents, inclusion of training materials in supplier onboarding.

3. Engaging with Stakeholders to Monitor Working Conditions

Signifyc Ltd - trading as Open Consulting™ actively engages with various stakeholders to help monitor working conditions across our operations and supply chain:

- **Our Suppliers:** We maintain regular communication with our suppliers, conducting due diligence assessments and incorporating labour standards into our supplier agreements. We encourage open dialogue and collaboration to address any potential risks.
- **Workers within Organisation:** We have established channels for our employees to raise concerns or report potential issues related to working conditions, including modern slavery. This includes regular staff meetings, confidential reporting mechanisms.
- **Workers within Supply Chain:** We seek to understand the working conditions of individuals within our supply chain through various methods, including supplier questionnaires, audits, and engagement with worker representatives where appropriate.
- **Businesses in Industry or Sector:** We actively participate in industry forums and initiatives focused on combating modern slavery and promoting ethical labour practices. This allows us to share best practices and collaborate on solutions to common challenges.

3.1 Social Audits

To look for signs of forced labour, we utilise social audits within our supply chain. During the reporting period, we employed the following types of audits:

- **Audit conducted by our staff:** Our internal audit team conducted audits of key suppliers, focusing on labour practices.
- **Audit conducted by supplier's staff:** We require some of our lower-risk suppliers to conduct self-assessments and provide evidence of their compliance with our labour standards.
- **Announced audit:** The majority of our audits are announced to allow suppliers to prepare relevant documentation and ensure appropriate personnel are available.
- **Unannounced audit:** In certain high-risk situations or for follow-up audits, we conduct unannounced audits to gain a more accurate understanding of working conditions.

3.2 Grievance Mechanisms

Signifyc Ltd - trading as Open Consulting™ has several grievance mechanisms in place to allow workers in our operations or supply chains to raise concerns or make complaints:

- **Using anonymous whistleblowing services, such as a helpline or mobile phone app:** We provide access to a confidential and independent whistleblowing service through a dedicated helpline and a secure mobile phone application that allows workers to report concerns anonymously without fear of retaliation. This service is available to all employees and supply chain workers.
- **Through trade unions or other worker representative groups:** We recognise and respect the role of trade unions and other worker representative groups in advocating for workers' rights. We engage in open dialogue with these groups to address any concerns raised by workers in our operations and supply chains. We also have a dedicated email address for grievance reporting and hold regular worker forums at our operational sites.

4. Modern Slavery Risks

Signifyc Ltd - trading as Open Consulting™ did not identify any modern slavery risks in its operations or supply chains during the period of this statement. We maintain a proactive approach to risk assessment and due diligence to ensure the ongoing prevention of modern slavery. Our risk assessment processes consider factors such as geographical location, industry sector, and the nature of the goods and services being procured.

5. Finding any International Labour Organization (ILO) Indicators of Forced Labour

This statement does not refer to finding any ILO indicators of forced labour during the reporting period. While we did not identify any specific instances, we remain vigilant and continue to monitor our operations and supply chains for any potential signs of forced labour in line with the ILO's indicators.

6. Demonstrating Progress Over Time

Signifyc Ltd - trading as Open Consulting™ is committed to continuously improving our approach to addressing modern slavery risks. To demonstrate our progress over time, we are implementing the following measures:

- **Key Performance Indicators (KPIs):** We are developing and will implement key performance indicators (KPIs) to measure the effectiveness of our modern slavery initiatives. These KPIs will include the percentage of key suppliers who have undergone a social audit, the number of modern slavery training sessions conducted, and the number of reports received through our whistleblowing mechanism. We will track these KPIs on a regular basis and use them to inform our future strategies.
- **Progress Goals for Next Statement:** For our next statement, we have set the following progress goals:
 - To increase the percentage of our high-risk suppliers who undergo unannounced audits.
 - To further enhance our training program by developing sector-specific modules for our procurement team.
 - To conduct a comprehensive review of our grievance mechanisms to ensure their effectiveness and accessibility for all workers in our supply chain.
- **Enhanced Due Diligence:** We will continue to strengthen our due diligence processes, particularly for suppliers operating in regions identified as having a higher risk of modern slavery. This will include more in-depth risk assessments and enhanced monitoring activities.
- **Collaboration and Partnerships:** We will actively seek opportunities to collaborate with industry peers, NGOs, and other stakeholders to share best practices and collectively address the challenges of modern slavery.

This statement is approved by the Board of Directors of Signifyc Ltd - trading as Open Consulting™.