

## mthree Modern Slavery and Human Trafficking Statement

### Introduction

mthree Corporate Consulting Limited (“mthree”) is committed to preventing acts of modern slavery and human trafficking from occurring within its operations and supply chain and imposes the same high standards on its suppliers. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to safeguard against any form of modern slavery taking place in our own business or in our supply chains.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015.

### Statement Scope

This statement covers the activities of all mthree entities operating in the United Kingdom. Although this statement does not cover mthree non-UK operating entities, we are committed to ensuring that all our operating entities work to the same high standards.

mthree currently operates (actively or has corporate entities) in the following countries:

Canada	Germany	Poland
Singapore	Hungary	Ireland
Hong Kong	USA	India

### Our Business

Mthree provides high quality, cost-effective and client-focused IT and Financial Markets technology consultancy services worldwide. We focus on delivering workforce solutions by providing diverse emerging talent, and reskilling training within organisations seeking to bridge skills gaps.

### Organisational Structure and Policies

We recognise the potential risk of modern slavery in two main areas of our business, our colleagues (including our ‘Alumni’) and our supply chain.

#### 1. Our people

As a largely skilled workforce, based predominantly in the UK, the risk of modern slavery occurring in our direct operations is deemed to be low. Our approach is underpinned by our open, transparent and ethical behaviour, our contracts of employment and our policies. Our Code of Ethics and Business Conduct policy outlines mthree’s position and expectations of employees and wider stakeholders, and includes our alignment to the UN Global Compact. The policy commitments include business ethics, equal opportunities, anti-bribery and anti-corruption, harassment, discrimination and bullying, and human rights.

As well as an internal grievance process and policy, mthree also has a stand-alone Whistleblowing policy, enabling all employees, management, consultants, and temporary and contingent workers to report

wrongdoing or malpractice without fear of reprisal. All policies are available to our colleagues and, as part of our commitment to continuous improvement, are reviewed/updated on an annual basis. They are developed by the COO with the assistance of the Senior Management Team.

We also take steps to mitigate any risk, regardless of how low that risk is deemed to be. These include:

- Conducting right to work checks for all employees
- Not engaging employees and contractors under the age of 18
- Using reputable agencies for recruitment
- Providing a safe and inclusive workplace, where everyone is treated with dignity and respect.

## 2. Our supply chain

Our UK supply chain is predominantly comprised of software and technology service providers based in the UK or in the US, which significantly reduces the likelihood of encountering modern slavery risks typically associated with high-risk sectors such as manufacturing, agriculture, or construction. Nevertheless, we remain vigilant and committed to maintaining robust processes to assess and address any potential risks, however low they may be.

As part of our commitment to combating modern slavery, we have implemented the following policies:

- Anti-Slavery Policy: we encourage all our workers to be aware of the signs of modern slavery and know how to report their concerns.
- Whistleblowing Policy: we encourage all of our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation.
- Code of Ethics and Business Conduct: we make it clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- Vendor Code of Conduct: this outlines our expectations from suppliers regarding modern slavery, human rights, and labour. We ask that all vendors work to ensure there is transparency in their business and supply chains and commit to identifying risks of modern slavery practices and human rights abuses.
- Recruitment Policy: we use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers from that agency.
- Background Screening Policy: we ensure that all employees, both working internally and externally, are thoroughly vetted before the commencement of employment.

## Assessing and Managing Risk

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- By using tools such as Global Slavery Index, we consider the supply chain broadly to assess particular products or geographical risks of modern slavery and human trafficking,
- we conduct supplier questionnaires, and
- decline work with suppliers who do not meet the standard we expect.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains, and
- provide adequate protection for whistle-blowers.

## Due Diligence

mthree strives to evaluate the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by reviewing our suppliers and where we are operating.

We do not consider that we operate in high-risk sectors or locations because of our geographic scope, the type of work that we carry out, and the type of procured goods and services (predominantly software and professional services).

Over the next 12 months we will seek to improve our due diligence processes by assessing a greater percentage of suppliers by spend against a range of criteria.

## Effectiveness

Mthree will promptly and thoroughly investigate any claim or indication that a supplier is engaging in human trafficking or modern slavery or has failed to comply with requirements and principles in the Vendor Code of Conduct. If we find evidence of a failure to comply, we will immediately evaluate our relationship with the relevant supplier.

There were no instances of modern slavery or human trafficking concerns raised to us or identified as part of our due diligence process during the last twelve months.

## Training

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our mandatory training programmes, employees are encouraged to identify and report any potential breaches of the organisations anti-slavery and human trafficking policy.

Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

## Approval



David Hanks

COO

MThree Corporate Consulting Limited