



Modern Slavery and Human Trafficking Statement

For the Financial Year Ending 31 March 2026

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Zaizi Ltd's modern slavery and human trafficking statement for the financial year ending 31st March 2026.

Although Zaizi Ltd falls below the statutory threshold requiring publication of this statement, we voluntarily publish this document to demonstrate our commitment to preventing modern slavery and human trafficking in our operations and supply chains, reflecting our ethical responsibilities and supporting our obligations to public sector clients and partners.

Our Commitment and Policy

Zaizi Ltd 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 modern slavery and human trafficking are not taking place anywhere in our own business or in any of our supply chains. We maintain a **zero-tolerance approach** to modern slavery.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers, and other business partners, and we reserve the right to audit their compliance.



Organisation Structure and Supply Chains

Our Business

Zaizi Ltd is an Information Technology consultancy that partners with public sector organisations, primarily in the UK government, defense, and security sectors, and our workforce is largely comprised of skilled, permanent employees. We are committed to maintaining a safe, inclusive, and fair working environment for all staff.

Our Supply Chains

Our supply chain is relatively short and predominantly consists of:

- Professional services (e.g., legal, accounting, recruitment).
- IT hardware, software licensing, and cloud service providers.
- Office supplies, utilities, and facilities management (e.g., cleaning and security).

Given the nature of our business and our location, we assess the risk of modern slavery existing within our direct operations to be **low**. The highest potential risk is assessed as residing within the extended supply chain, specifically concerning the global sourcing of IT hardware and cleaning/facilities services.

Governance and Responsibility

Oversight of this statement and the implementation of our anti-slavery strategy is the responsibility of the **Directors**, supported by a cross-functional compliance team including representatives from Human Resources, Sales, and Finance. This structure ensures that ethical sourcing and labour standards are integrated across our business functions.

Relevant Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Anti-Slavery and Human Trafficking Policy:** This policy reflects our commitment to acting ethically and with integrity in all our business relationships, to implementing, enforcing effective systems, controls to ensure slavery and human trafficking is not taking place anywhere within our supply chain.
- **Whistleblowing Policy:** We encourage all of our employees, customers, and other business partners to report any concerns related to the direct activities of the company or its supply chains.
- **Recruitment Policy:** We maintain a robust process of vetting all new employees, including checking immigration status and proof of right to work, to ensure compliance with all applicable employment laws.
- **Code Ethics and Professional Conduct Policy:** This document outlines the expected standards of behaviour and professional ethics for all employees and contractors, explicitly prohibiting unlawful conduct, including modern slavery and forced labour.

Due Diligence and Risk Management

We undertake the following enhanced due diligence and risk management procedures:

Internal Controls

We maintain rigorous internal controls concerning staff hiring, pay, and conditions of employment. We are committed to fair compensation practices and ensure that all our direct employees are paid at least the **National Living Wage** and are provided safe working environments.

Procurement Practices and Contractual Obligations

When engaging new suppliers, we mandate compliance with our ethical sourcing requirements. Our standard contracts now include:

1. Specific clauses requiring compliance with all local and international modern slavery laws, including the Modern Slavery Act 2015.

2. The contractual **Right to Audit** suppliers and their sub-suppliers to ensure adherence to our standards.
3. A mandatory **Supplier Questionnaire** for all high-risk or new key suppliers, covering governance, compliance, and labour practices.

Supply Chain Mapping and Initial Risk Assessment

We conduct an initial review and risk rating of all new major suppliers to identify potential risk areas. We pay particular attention to suppliers providing physical goods or low-skilled services, where the risk profile may be higher.

Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we plan to provide mandatory annual training to **key procurement staff, the leadership team, and all employees**.

This training will cover:

- The definition of modern slavery and human trafficking.
- How to identify potential signs of slavery within the supply chain and operations.
- The process for reporting concerns via our Whistleblowing Policy.

Key Performance Indicators (KPIs)

To gauge the effectiveness of our actions and demonstrate measurable progress, we intend to monitor the following KPIs annually:

1. **Staff Training Completion:** of all relevant staff (procurement and HR) will complete modern slavery awareness training annually.



2. **Supplier Compliance Checks:** The percentage of new major suppliers who acknowledge receipt and acceptance of our ethical purchasing terms/Supplier Code of Conduct (Target: 100% upon onboarding).
3. **Supplier Due Diligence:** The number of key suppliers audited or subject to a detailed compliance questionnaire in the reporting year (Target: 10% of high-risk suppliers annually).
4. **Risk Register Incidents:** Zero substantiated incidents or reports raised under our Whistleblowing Policy relating to modern slavery or forced labour.

Approval

This statement has been formally approved by the Directors of Zaizi Ltd on 10th December 2025 and will be reviewed and updated annually.

Tracey Robinson

Name: TRACEY ROBINSON

Position: CHIEF PEOPLE OFFICER

Date: 2025-12-10