

MODERN SLAVERY STATEMENT

Organisation: Graphinixx

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Business Name: Graphinixx

Effective Date: 11 May 2026

Review Date: 11 May 2027

1. INTRODUCTION

1.1 Statement of Commitment

Graphinixx is a professional services provider committed to the highest ethical standards in all aspects of our business operations. We recognise our responsibility to ensure that modern slavery and human trafficking do not occur within our organisation or our supply chains. This Modern Slavery Statement is published in accordance with the requirements of the Modern Slavery Act 2015 and sets out the steps we have taken, and continue to take, to identify and address the risks of modern slavery and human trafficking throughout our operations.

1.2 Organisational Structure and Supply Chains

Graphinixx operates as a professional services provider, offering specialised expertise and consultancy services to clients across multiple sectors. Our business operations are primarily based within the United Kingdom, with a workforce comprising permanent and contracted professionals. Our supply chains are limited in scope given the service-based nature of our business; however, we do engage with various suppliers for goods and services, including office equipment, professional services, technology solutions, and facilities management.

Our key supply chains include:

- **Technology and Software Providers:** Companies providing software licences, cloud services, and IT infrastructure
- **Facilities and Office Services:** Providers of office space, cleaning, security, and maintenance services
- **Professional Services:** Recruitment agencies, training providers, and specialist consultants
- **Administrative Services:** Suppliers of stationery, printing, and general administrative support

1.3 Governance and Responsibility

The Board of Directors of Graphinixx holds overall responsibility for ensuring that appropriate measures are in place to prevent modern slavery throughout the organisation. Responsibility for the implementation and oversight of our anti-slavery policies and procedures has been delegated to our Senior Management Team, with specific oversight provided by our Human Resources Department and Procurement function.

All employees and contractors working for Graphinixx are expected to adhere to our values and policies, including our commitment to preventing modern slavery and human trafficking. This commitment extends to all third parties with whom we do business.

2. RISK ASSESSMENT

2.1 Assessment Methodology

Graphinixx has undertaken a comprehensive risk assessment to identify potential areas of vulnerability to modern slavery and human trafficking within our operations and supply chains. This assessment considered the nature of our business operations, the geographical locations in which we operate, the characteristics of our workforce, and the nature of our supplier base.

2.2 Internal Operations Risk

Given that Graphinixx operates as a professional services provider, primarily based in the United Kingdom, the direct risk of modern slavery within our internal operations is considered to be relatively low. We employ a workforce of skilled professionals who are subject to robust employment contracts and who benefit from competitive terms and conditions of employment.

Nevertheless, we acknowledge that risks may arise through:

- **Recruitment and Onboarding:** Ensuring that all individuals recruited are doing so willingly and with appropriate verification of identity and working rights
- **Working Conditions:** Ensuring that all employees are treated fairly, paid appropriately, and work in safe and healthy conditions
- **Contracted Staff:** Managing risks associated with individuals engaged through recruitment agencies or as independent contractors

Our internal operations are located within the United Kingdom, a jurisdiction with strong legal protections against modern slavery and human trafficking. We maintain robust human resources practices, including comprehensive employment contracts, fair payment procedures, and safe working environments.

2.3 Supply Chain Risk Assessment

Our supply chain risks are assessed across multiple dimensions:

Geographic Risk: We endeavour to engage primarily with suppliers based within the United Kingdom and other jurisdictions with strong labour law protections and enforcement mechanisms. However, some of our suppliers may source materials or services from countries where labour standards may be less stringently enforced, or where the risk of modern slavery may be elevated.

Sector Risk: Certain sectors are recognised as presenting elevated risks of modern slavery and human trafficking. Within our supply chains, sectors presenting potentially higher risk include:

- Facilities management and cleaning services
- Security services
- Agriculture and food supply (if relevant to facilities provision)
- Manufacturing of goods (such as office equipment)
- Logistics and transportation

Supplier Characteristics: We have assessed the risks associated with different categories of suppliers:

- **Large, Established Suppliers:** Multinational organisations and large established businesses typically have greater resources to implement robust anti-slavery measures and are more likely to have formalised policies and procedures. These suppliers present lower assessed risk.
- **Small and Medium-Sized Suppliers:** Smaller organisations may have fewer resources dedicated to compliance and due diligence. However, many operate within low-risk sectors and within the United Kingdom, which reduces overall risk exposure.
- **International Suppliers:** Where we engage suppliers based outside the United Kingdom, the regulatory environment and enforcement of labour standards may be less rigorous, presenting elevated risk.

Service Specific Risks: Analysis of our key supply chains indicates:

- **Facilities Management:** Services such as cleaning and maintenance may employ vulnerable workers, particularly migrant workers, who may be at elevated risk of exploitation. We have identified this as our highest-risk supply chain category.

- **Recruitment Services:** Recruitment agencies must be engaged with appropriate due diligence to ensure that they comply with employment standards and do not engage in exploitative practices.

- **Professional Services and Technology:** These higher-value supply chains typically involve more established organisations with existing compliance frameworks, presenting lower risk.

2.4 Overall Risk Profile

Based on our assessment, Graphinixx considers itself to present a relatively low overall risk profile for modern slavery and human trafficking, given:

- Our location within the United Kingdom
- Our service-based business model
- Our relatively limited and manageable supply chain
- Our focus on engaging established suppliers

However, we acknowledge that no organisation is entirely without risk, and we remain committed to ongoing identification and mitigation of potential vulnerabilities.

3. DUE DILIGENCE

3.1 Due Diligence Framework

Graphinixx has implemented a comprehensive due diligence framework designed to identify and mitigate risks of modern slavery and human trafficking. Our due diligence processes operate at multiple levels and are proportionate to the assessed risk level of each engagement.

3.2 Supplier Engagement and Evaluation

Initial Engagement: All new suppliers are required to complete a supplier information questionnaire prior to engagement. This questionnaire is designed to establish baseline information regarding the supplier's approach to labour standards, human rights, and modern slavery prevention. Suppliers are required to confirm:

- Their commitment to legal compliance and ethical business practices
- That they do not engage in modern slavery or human trafficking
- That they comply with applicable employment legislation
- That they will cooperate with any audit or investigation by Graphinixx

Supplier Assessment: Suppliers are assessed using a risk-based approach. Higher-risk suppliers (such as those in facilities management or based in higher-risk jurisdictions) are subject to more intensive assessment, which may include:

- Detailed questionnaires regarding their labour practices and supply chains
- Review of their modern slavery statements (where applicable)
- Request for evidence of compliance certifications or audit reports
- Site visits and inspections
- Request for details of their own supplier due diligence processes

Lower-risk suppliers may be subject to less intensive assessment, focusing on confirmation of legal status, basic compliance with employment legislation, and commitment to ethical standards.

Ongoing Monitoring: Supplier relationships are subject to ongoing monitoring to ensure continued compliance with our standards. This includes:

- Annual reconfirmation of supplier information

- Review of any changes in supplier ownership or structure
- Monitoring for any adverse media coverage or regulatory action
- Regular communication regarding our expectations

3.3 Workforce Management and Employment Practices

Recruitment and Onboarding: Graphinixx maintains robust recruitment procedures designed to ensure that all individuals are recruited willingly and with appropriate verification. Our recruitment procedures include:

- Verification of identity and right to work in the United Kingdom
- Checks to confirm criminal history (where appropriate)
- Employment references from previous employers
- Clear employment contracts setting out terms and conditions
- Transparent communication regarding remuneration and working arrangements

Employment Standards: All employees are employed on the basis of written contracts of employment that comply with UK employment legislation. Our employment practices include:

- Competitive and transparent remuneration
- Reasonable working hours
- Safe and healthy working conditions
- Freedom of association
- Non-discrimination policies
- Grievance and disciplinary procedures
- Clear communication regarding rights and responsibilities

Contracted and Agency Staff: Where we engage individuals through recruitment agencies or on a contracted basis, we:

- Ensure that the recruitment agency or contractor is reputable and operates in compliance with employment legislation
- Verify that the individual has agreed to the engagement and understands the terms
- Ensure that remuneration and working conditions are fair and legal
- Maintain records to verify compliance

3.4 Training and Awareness

We recognise that awareness and understanding of modern slavery are essential to identifying and preventing exploitation. Graphinixx has implemented a training and awareness programme designed to:

- Ensure that all employees understand the nature and risks of modern slavery
- Educate staff regarding indicators of potential exploitation
- Set out the reporting mechanisms available to employees
- Promote a culture of ethical conduct and responsibility

Training is provided to all new employees as part of their induction process and is refreshed periodically for all staff members. Enhanced training is provided to employees in higher-risk functions, including procurement, human resources, and supplier management.

3.5 Grievance and Reporting Mechanisms

Graphinixx is committed to ensuring that any concerns regarding modern slavery or potential exploitation can be raised safely and without fear of retribution. We maintain:

- Internal grievance procedures allowing employees to raise concerns
- A confidential reporting mechanism for anonymous disclosure
- Procedures to ensure that any complaints are investigated promptly and thoroughly
- Protection against victimisation or retaliation for those raising concerns in good faith

All employees are informed of these mechanisms during induction and are encouraged to report any concerns.

3.6 Remediation and Support

Should any evidence of modern slavery or human trafficking be identified, Graphinixx is committed to:

- Conducting a thorough investigation to establish the facts
 - Taking immediate steps to cease any exploitative conduct
 - Cooperating fully with law enforcement authorities
 - Providing support to any affected individuals
 - Implementing measures to prevent recurrence
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4. REVIEW

4.1 Policy Review and Continuous Improvement

This Modern Slavery Statement and the underlying policies and procedures will be reviewed annually to ensure continued effectiveness. The review will consider:

- Any changes in business operations or supply chains
- Updates to legislation or regulatory guidance
- Feedback from employees, suppliers, and other stakeholders
- Any incidents or concerns identified
- Best practice developments in the industry

The next review of this statement is scheduled for 11 May 2027.

4.2 Effectiveness Measurement

The effectiveness of our anti-slavery measures is assessed through:

- The absence of reported incidents of modern slavery

- Completion rates for training and awareness activities
- Supplier compliance with our standards and requirements
- Feedback from internal and external audits
- Stakeholder feedback and engagement

4.3 Approval and Signature

This Modern Slavery Statement has been approved by the Board of Directors of Graphinixx and represents our commitment to the prevention of modern slavery and human trafficking throughout our operations and supply chains.

Signed:

Board of Directors

Graphinixx

Date: 11 May 2026

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