

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 28 February 2022.

Adsum Technologies Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

## Organisational structure

Adsum Technologies Ltd is the parent company of the Adsum Finance Ltd, Adsum Ltd and A1T1 Ltd group and has business operations in the United Kingdom.

We operate in the Financial Services sector. The nature of our supply chains is as follows: We work with a number of key direct suppliers, who provide us with goods, such as equipment for our premises, and services, such as outsourced business processes, IT software, Professional services (solicitors) and marketing services.

For more information about the Company, please visit our website: <https://adsum-works.com/>.

## Policies

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

These include the following:

- **Whistleblowing policy** - Reporting any infringement internally through senior management or externally through our representatives.

We make sure our suppliers are aware of our policies and adhere to the same standards.

## Due Diligence

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

- Checking certain suppliers with external third parties for any slavery or human trafficking risks.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

## Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.

We do not consider that we operate in a high-risk environment because The business operates in this risk level environment because the majority are based in the UK and operate in low risk industries such as IT software and professional services.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

## **Effectiveness**

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will train our staff about modern slavery issues and increase awareness within the Company.

## **Training our staff**

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chain.

The statement was approved by the board of directors.

*Justina Tartilaite*

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Justina Tartilaite, Director  
Adsum Technologies Ltd