Modern Slavery Policy

Matrix iQ
CONNECTING TECHNOLOGY WITH INTELLIGENCE

Our commitment

We are committed to acting ethically, treating people with dignity and respect, and preventing modern slavery and human trafficking in everything we do. This includes our own operations and the partners, suppliers and contractors we work with. Modern slavery includes forced labour, human trafficking, servitude, debt bondage, sexual or criminal exploitation and child labour. We do not tolerate any form of modern slavery.

(The Modern Slavery Act 2015 defines modern slavery and requires organisations to take steps to prevent exploitation, including in supply chains.)

Our legal responsibilities

We comply with the Modern Slavery Act 2015, including the requirement to identify and address risks of modern slavery in our operations and supply chains.

Key points:

- Section 54 of the Act requires certain organisations to publish an annual Modern Slavery Statement.
- A statement must set out the steps taken to prevent modern slavery in our business and supply chains.
- Updated government guidance sets clearer expectations for detailed and meaningful reporting, particularly around risk, due diligence and evidence of action.

Upcoming changes (from 2026 onward)

The UK government has announced significant changes taking effect for financial years ending on or after 31 March 2026, including:

- Mandatory reporting areas on six topics: structure, policies, due diligence, risk assessment, training and KPIs/effectiveness.
- Board-level approval and director sign-off, including personal accountability.
- A single government registry for statements and an annual filing deadline (expected 30 September).
- Unlimited fines for non-compliance and public "name and shame" lists.

  All introduced under planned Modern Slavery Act reforms for 2026.

We will adopt these requirements as standard practice now to ensure full readiness.

Our approach

We take a proactive, transparent approach. This means:

- Treating all people fairly and respectfully.
- Ensuring our suppliers share our commitment to ethical conduct.
- Being open about risks and addressing them quickly.
- Building long-term, responsible relationships with partners and contractors.

Our structure and supply chain

We review our supply chains regularly to identify potential risks, including:

- Labour-intensive services
- High-risk geographies
- Outsourced manufacturing or logistics
- Recruitment through labour agencies

We expect all suppliers to meet the same ethical standards we apply internally.

Policies and controls

We have internal policies that support prevention of modern slavery, including:

- Recruitment and Right-to-Work checks
- Code of Conduct
- Anti-bribery and corruption policy
- Whistleblowing
- Procurement and supplier management

These policies apply to everyone working with or on behalf of the company.

Due diligence

We maintain due diligence processes appropriate to the level of risk. These may include:

- Supplier onboarding checks
- Contractual obligations prohibiting modern slavery
- Risk-based supplier assessments
- Evidence-based checks for labour providers
- Considering modern slavery risks during procurement decisions (Government guidance encourages structured due diligence and continuous improvement.)

Risk assessment and management

We assess where risks may arise, such as:

- Use of subcontractors
- Seasonal or temporary labour
- Low-skill, low-wage sectors
- Overseas sourcing

Where risks are identified, we take immediate steps to mitigate them.

Updated Home Office guidance emphasises transparency, including reporting identified risks, gaps in knowledge and actions taken.

Training and awareness

We provide training to everyone involved in procurement, people management or supply chain activity so they can identify and report concerns. Training is one of the six core reporting areas under the Act.

Reporting concerns

We actively encourage concerns to be raised early. Employees, contractors and suppliers can report:

- Unethical behaviour
- Suspicion of exploitation
- Unsafe recruitment practices
- Any concerns relating to labour providers or suppliers

Concerns can be raised via managers, People & Culture, or our confidential whistleblowing routes. There will be no retaliation for raising genuine concerns.

Monitoring and effectiveness

We review our approach annually and monitor:

- Supplier performance
- Effectiveness of due diligence
- Completion of training
- Any reported incidents and how they were resolved

Our Modern Slavery Statement

If required by law (turnover → £36m), we will publish an annual Modern Slavery Statement that:

- Addresses all mandatory reporting areas.
- Includes board-level approval and director signature.

- Is submitted to the central government registry by the required deadline.
- Is published on our website and easily accessible.

Even if we fall below the threshold, we may choose to publish a voluntary statement as part of our ethical and responsible business commitment.

Continuous improvement

We commit to ongoing development of our safeguards, including:

- Strengthening reporting systems
- Enhancing supplier auditing
- Improving visibility across supply chains
- Regularly updating training
- Following emerging best practice and regulatory developments

Given anticipated future legislation (such as proposed UK supply-chain human rights due-diligence requirements), we will evolve our processes to stay ahead of compliance expectations.