

## Modern Slavery and Human Trafficking Statement

For the Financial Year Ending 31/10/2025

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps Medhurst Communications Ltd has taken to ensure that slavery and human trafficking are not taking place in our business or supply chains.

### 1. Organisation Structure and Supply Chains

Medhurst Communications Ltd is a UK-based limited company operating in the Education and Commercial Sectors. Our activities are; The provision and ongoing support of IT services and solutions including Servers and Storage, Switching and Wireless, Outsourced Managed Services, Hosted Services, IT Support and Hardware procurement and supply throughout the UK.

### 2. Policies in Relation to Modern Slavery

We are committed to acting ethically and with integrity in all our business relationships. Our policies include:

- Anti-Slavery and Human Trafficking Policy
- Whistleblowing Policy
- Code of Conduct
- Equal Opportunities
- Corporate and Social Responsibility
- Supplier Evaluation
- Procurement Policy

These policies are regularly reviewed and communicated to staff and suppliers.

### 3. Due Diligence Processes

We undertake due diligence when considering new suppliers and regularly review our existing suppliers. Our due diligence includes:

- Risk assessments based on geography, sector, and supplier size
- Supplier assessment questionnaires
- Contractual clauses requiring compliance with the Modern Slavery Act
- Site visits and audits where appropriate
- Procurement Policy

### 4. Risk Assessment and Management

We have identified the following areas as higher risk:

- Overseas suppliers of Equipment
- Use of subcontracted labour
- Temporary labour agencies

To mitigate these risks, we:

- Only use UK based suppliers
- Use pre-approved supplier frameworks
- Require transparency in supply chains
- Monitor compliance through audits and reporting mechanisms

## 5. Training and Awareness

We provide training to staff to help them identify and report signs of modern slavery. This includes:

Training:

- Induction training for new employees
- Annual refresher courses
- Targeted training for procurement and HR teams

Awareness/Availability

- All policies are available to staff via our internal people portal
- All policy changes are communicated to staff

## 6. Measuring Effectiveness

We use the following key performance indicators (KPIs) to measure our effectiveness:

- Number of supplier audits completed
- Percentage of staff trained on modern slavery
- Number of reported concerns and actions taken

## 7. Future Commitments

In the coming year, we aim to:

- Expand our supplier audit programme
- Collaborate with Vendors to share best practices
- Enhance our risk assessment tools

## 8. Approval

This statement has been approved by the Board of Directors and signed by:

Charlie Baynes



Managing Director

16/05/2025