MODERN SLAVERY POLICY

Foreword



Meganenxus Limited is committed to the sustainable development of our business. This includes putting in place the right governance, policies and processes to help us understand and improve our impact on people and the planet. We take our responsibilities seriously.

We are committed to ensuring that human trafficking and forced, bonded or compulsory labour has no place in our business or our supply chain. Our directors and senior management are responsible for implementing our controls in this area and for making sure that colleagues have the right resources – including training, investment and confidential reporting channels – to minimise risk wherever we operate.

We are aware that the risk of exploitation is likely to rise during periods of political and economic uncertainty, so we will continue to review our controls and take fast action wherever necessary.

Perry Sutherland Chief Operating Officer

About Our Business

Meganexus is headquartered in the United Kingdom. We also operate out of India. We provide software and services in six main sectors:



VCSE - Voluntary, Community and Social Enterprises

Our case management, assessment, intervention management and community support solutions are designed for use by support workers and their service users.



Justice

We provide service-user-friendly solutions to every prison in England & Wales. These include intervention management services, assessment screening, prison industry solutions, and contract compliance/management for HMG and its providers.



Education

We started providing services to educational establishments and communities over 10 years ago, creating innovative software solutions to assess, support, track and report on a range of education needs.



Central Government

We understand the requirements commercial directorates face in being accountable through monitoring, accurate reporting and ensuring value for money. Our secure platform delivers a practical, scalable, and affordable solution for managing providers.



Communities

We have worked with Local Authorities and their providers to successfully support people with challenges including substance misuse, reintegration after prison and helping young people not in employment or education.



Healthcare

We have developed specialist applications and tools such as learning disability screening, specialist assessments and intervention management.

Our Values

Meganexus Ltd values innovation, integrity, customer-centricity, collaboration, and empowerment. We focus on developing ethical, tailored technology solutions that enhance service delivery in the public and third sectors, particularly for vulnerable populations.

About Our Supply Chain

We source components and services to support our operations, and global companies make up the bulk of our supply chain. We recognise that the level of management control required for the review of any imports from sources from outside of the UK and EU is potentially higher than that from within, as the former can be more at risk of slavery and/or human trafficking issues.

We map our supply chain to assess product and geographical risks of modern slavery and human trafficking and will perform additional checks on suppliers operating in high-risks regions according to The Walk Free Foundations Global Slavery Index.

However, most of our suppliers for our operations outside the EU are contracted centrally (and are subject to the same controls we set out below). Furthermore, the main provider of services from India is our sister company, Meganexus Limited, India, which is part of the same corporate reporting structure.

Policy and Action

We will not support or deal with any business that we know to be involved in slavery or human trafficking, and we comply with internationally recognised standards on human rights, the principles of the UN Global Compact and the elimination of child labour. The risk of modern slavery and human trafficking within our group and our supply chain is assessed by our compliance and risk team prioritising critical / high risk suppliers and all new vendors.

We also ensure our responsibilities in this area are communicated effectively and transparently among our colleagues and partners.

Regarding our supply chain, our actions include:

- Taking steps to ensure that each new supplier confirm the controls undertaken by it to combat slavery and human trafficking in its organisation and supply chain, before that supplier is approved on our systems.
- Using a risk-based approach, taking steps to ensure that we monitor and audit existing suppliers, including verification of the controls undertaken to combat modern slavery.
- Including in supplier contracts, where possible, appropriate provisions around compliance with the Modern Slavery Act 2015, equivalent legislation and associated policies.

In addition, we have a set of internal supporting policies in place, to protect against the risks of slavery and human trafficking.

Whistle Blowing Policy

We encourage all our employees, customers and partners to report any concerns related to our direct activities or our supply chains. This includes any circumstances that might give rise to concerns relating to modern slavery or human trafficking within Meganexus or Meganexus suppliers.

Equality, Diversity and Dignity Policy

Meganexus aims to be an employer of choice, for people from different backgrounds promoting respect for the individual and equality of opportunity.

We promote a culture of openness, fairness and respect, promoting and protecting everyone's human rights. We are committed to eliminating discrimination and encouraging diversity.

Safeguarding Policy

Sets out our commitment to safeguarding our colleagues and any other adults or children we encounter at work. We provide colleagues with a process to manage any potential safeguarding concerns and provide a framework for the company to effectively handle any concerns raised.

Recruitment Policy

We employ a team of experienced recruitment professionals responsible for providing a comprehensive range of solutions to our permanent and fixed-term recruitment needs. For temporary and contract recruitment needs our arrangements include a managed service agreement with a supplier with the right controls to combat slavery and human trafficking.

Annual Compliance Training

Policies are made available to all employees, and all employees take compliance training both as part of their induction process and annually. This online training serves as a reminder of the significance of the work we do and the importance of following company policy. Modules on Equality, Diversity and Dignity remind us about our responsibilities concerning slavery and human trafficking. Completion of the training is mandatory and is audited across the business.

As part of the wider Meganexus group, we also adhere to the Meganexus Code of Conduct, which promotes ethical behaviour in all our business dealings.

Effectiveness

We use the following Key Performance Indicators (KPIs) to measure the effectiveness of the steps we have taken:

ΚΡΙ	FY 25/26
Number of modern slavery instances identified within our operations or supply chain	0
% of assessed suppliers in our supply chain that have a modern slavery statement (where required)	100%
% of assessed suppliers that support and confirm compliance with the principles of the Modern Slavery Act 2015 (where required)	100%
% of employees who have completed annual mandatory compliance training	100%

Goals

We will continue to strengthen our risk identification and due diligence measures. We will continue to build capability across the organisation, particularly in procurement roles, so that our employees understand what steps they should be taking to prevent modern slavery in our supply chains.

Application

This statement is made under section 54 of the Modern Slavery Act 2015.

This statement relates to the following financial year April 2025 – March 2026.



Perry Sutherland Chief Operating Officer

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