

Modern Slavery & Human Trafficking Statement

JMS Infotech Ltd

Registered Office: Milton Keynes, United Kingdom

Financial Year: 1 April 2025 to 31 March 2026

Date of Approval: 28 January 2026

Approved by: Board of Directors

1) Our Commitment

JMS Infotech Ltd is committed to preventing modern slavery and human trafficking in all aspects of our business operations and supply chains. We recognise our responsibility to act ethically, with integrity and transparency, and to implement effective systems and controls to reduce the risk of exploitation.

We operate a zero-tolerance approach to modern slavery and human trafficking and expect the same high standards from our employees, contractors, suppliers, and business partners.

2) Our Organisation, Structure and Business

JMS Infotech Ltd is a UK-based organisation operating from Milton Keynes. The company operates as a **standalone legal entity** and this statement applies solely to JMS Infotech Ltd.

Our principal activities include:

- Software development and IT services
- Technology consulting and delivery support
- Testing and quality assurance services

Our workforce comprises directly employed staff and contracted personnel engaged in operational delivery and client services.

3) Our Supply Chains

Our supply chains support the delivery of IT and professional services and typically include:

- Technology vendors and software tools (including SaaS and cloud service providers)
- Recruitment and staffing agencies
- Professional services providers (legal, accounting, consulting)
- Office services and facilities suppliers
- Hardware and IT equipment suppliers

The majority of our suppliers operate within the UK; however, we recognise that certain technology and hardware supply chains may involve overseas manufacturing and subcontracting.

4) Modern Slavery Risk Assessment

Modern slavery can take many forms, including forced labour, bonded labour, child labour, servitude, and human trafficking.

While the technology and professional services sector is generally considered lower risk than labour-intensive industries, we recognise potential risks in the following areas:

- Third-party recruitment and staffing agencies
- Outsourced or subcontracted services
- Hardware and electronics supply chains
- Any low-skilled labour services used indirectly

We adopt a proportionate, risk-based approach to identifying, assessing, and managing these risks.

5) Policies and Governance

JMS Infotech Ltd has established a framework of policies and controls to support our commitment to preventing modern slavery and human trafficking, including:

- Code of Conduct / Ethics Policy
- Anti-Bribery and Anti-Corruption Policy
- Whistleblowing Policy
- Supplier Code of Conduct (where applicable)
- Human Resources policies covering fair treatment, equality, and grievance procedures

These policies are communicated to employees and made available to relevant third parties. All relevant policies are **reviewed periodically** to ensure continued effectiveness and alignment with legal and regulatory requirements.

6) Due Diligence and Supplier Management

We take a risk-based approach to supplier due diligence, proportionate to the nature of the goods or services provided. Our due diligence activities may include:

- Assessing supplier risk based on geography, service type, and labour model
- Incorporating modern slavery and ethical compliance clauses into relevant contracts
- Requesting confirmation of compliance with applicable employment and labour laws
- Reviewing supplier onboarding documentation and credentials
- Encouraging suppliers to report concerns without fear of retaliation

Where higher levels of risk are identified, enhanced due diligence measures may be applied, such as additional questionnaires or targeted audits. Non-compliance may result in corrective action or termination of the supplier relationship where appropriate.

7) Training and Awareness

We provide modern slavery awareness and guidance to employees whose roles involve recruitment, procurement, supplier management, or service delivery.

Training and awareness activities include:

- Recognising indicators of modern slavery and exploitation
- Understanding reporting and escalation procedures
- Awareness of supplier and contractor compliance expectations

Training is delivered as part of onboarding for relevant roles and refreshed periodically to ensure ongoing awareness.

8) Reporting Concerns

We encourage employees, suppliers, and other stakeholders to report any concerns relating to modern slavery or human trafficking.

Concerns can be raised through:

- Project managers or the Human Resources team
- The Whistleblowing reporting channel: **accounts@jmsinfotech.co.uk**
- The Compliance function or a member of the senior management team

All reports are taken seriously, investigated promptly, and managed in accordance with our internal procedures. Appropriate action is taken where concerns are substantiated.

9) Effectiveness, Monitoring and Continuous Improvement

JMS Infotech Ltd monitors the effectiveness of its actions to prevent modern slavery and human trafficking through proportionate governance arrangements, risk-based controls, and appropriate performance indicators.

The effectiveness of our approach is measured using the following indicators:

Supplier and Third-Party Due Diligence

- 100% of new suppliers and contractors are subject to modern slavery risk assessment at onboarding
- Higher-risk suppliers are required to confirm compliance with applicable labour and employment legislation
- Supplier risk assessments are reviewed periodically and when material changes occur

Contractual and Policy Controls

- Modern slavery and ethical compliance clauses are included in all relevant supplier, contractor, and agency agreements

Training and Awareness

- Modern slavery awareness guidance is provided to employees in relevant roles
- Training coverage and completion are reviewed at least annually

Incident Reporting and Management

- All modern slavery concerns are logged, investigated, and managed in line with internal procedures
- No confirmed incidents of modern slavery have been identified within our direct operations during the reporting period

Governance and Review

- This statement is reviewed and approved annually by senior management
- Policies and due diligence processes are reviewed regularly to ensure continued effectiveness

We are committed to continuous improvement and will continue to strengthen supplier screening, expand training coverage, and enhance monitoring and record-keeping in future reporting periods.

10) Approval

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes JMS Infotech Ltd's Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2026.

Signed: Bibu Thomas

Name: Bibu Thomas

Title: Director

Date: 28 January 2026