

ANTI-SLAVERY POLICY

A) INTRODUCTION

This policy ensures that Coderus complies with s.54 of the Modern Slavery Act 2015, and sets out the responsibilities for employers and employees.

Coderus is committed to ensuring that all of its business operations are free from involvement with slavery or human trafficking.

Annual statement

Coderus does not meet the conditions to be required to publish an annual slavery and human trafficking statement. However, we recognise the importance of addressing modern slavery throughout our business operations to ensure that slavery and trafficking are not taking place in any of our supply chains, or in any part of our own business.

B) POLICY

1) Organisational Structure

Coderus is based in the Ross Building, Adastral Park, Martlesham, Ipswich Suffolk, IP5 3RE, UK, with two virtual offices located in Norwich and Cambridge. The company holds three ISO certifications: 27001 (Security), 9001 (Quality) and 14001 (Sustainability).

The organisation does not have any sister companies and is controlled by two Directors.

The main function of the business is to provide software development services in the mobile and embedded sectors to various clients and companies. Our operations are not seasonal and our organisation is open for business consistently throughout the year.

The labour supplied to the organisation in pursuance of its operation is carried out solely in the United Kingdom, in particular, Suffolk.

2) Supply Chains

In order to fulfil its activities, Coderus' main supply chains include those related third party solution (software as a service) providers. We operate due diligence in ensuring that our suppliers comply with the current legislation and operate ethically.

3) Potential Exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist via use of third party suppliers (software as a service providers) and regularly revises its policies and procedures in line with current legislation and best practice.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

C) MEASURES

Coderus will review its potential exposure on an annual basis to ensure there are no gaps in the current operations of the business regarding modern slavery.

Coderus has developed key performance indicators to monitor and measure performance in regards to modern slavery:

Modern Slavery Act Compliance Score: Measure the company's compliance with the UK Modern Slavery Act, ensuring that necessary statements and disclosures are provided annually.
Acceptable Criteria: 100% - where requirements are applicable.

Training Attendance Rate: Monitor the attendance of employees in modern slavery awareness training sessions, ensuring that all relevant staff members receive adequate education on identifying and addressing modern slavery risks.
Acceptable Criteria: 100% - All staff to be fully trained on an annual basis.

Supplier Risk Assessment Completion Rate: Track the percentage of suppliers assessed for modern slavery risks, considering factors such as geographic location, industry, and supply chain complexity.
Acceptable Criteria: 100% - All suppliers must be assessed, and a risk assessment completed when the risk is Medium or High.

Third-Party Audit Frequency: Monitor the frequency of third-party audits conducted to assess suppliers' compliance with ethical labour practices and modern slavery regulations.
Acceptable Criteria: Bi-annual audits of all Suppliers to be completed.

Diversity and Inclusion Performance: Measure progress in promoting diversity and inclusion within the company, as diverse and inclusive workplaces are less susceptible to exploitation and discrimination.
Acceptable Criteria: Review Recruitment Policy annually, and update publically.

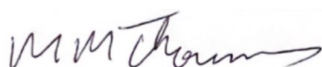
Public Transparency and Reporting Score: Evaluate the quality and transparency of public reporting on the company's efforts to combat modern slavery, including annual modern slavery statements and sustainability reports.
Acceptable Criteria: All Statements reviewed quarterly, and updated publicly annually.

D) ADDITIONAL ACTION POINTS

Coderus is committed to:

- Ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility
- Ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure
- Carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK
- Ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act
- Appointing a named individual to oversee the compliance with the Modern Slavery Act 2015 (this person is the HR Director).
- Identifying and addressing any areas of high risk in our supply chain
- Providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.

This policy is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed each financial year.

Signed: 

Position:

Name:

Date:

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