

# Modern Slavery and Human Trafficking

## Statement

This statement sets out the steps that eQuality Solutions Group Limited, (eQS) which incorporates all its subsidiary companies, has taken to ensure, as far as possible, that modern slavery is not taking place within our business or our supply chains. eQS has a zero-tolerance approach to modern slavery and is committed to acting ethically, transparently and with integrity in all our business dealings and relationships. This includes implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within eQS or in any of our supply chains. To our knowledge, there have been no instances of modern slavery to date.

We expect the same high standards from all of our contractors, suppliers and other business partners.

eQS is fully supportive of the government's objectives to eradicate modern slavery and human trafficking. All our employees are expected to report concerns and our management are expected to act upon them.

## Our Business

eQuality Solutions Group Limited (eQS) has a portfolio of diversity, equity and inclusion and wellbeing businesses, with a goal to remove barriers to learning in education, work and life and transforming organisational cultures to create social and business benefits on a national scale.

eQS is at the forefront of providing specialist services and technology solutions for cognitive disability and mental wellness, including diagnostic assessments, assistive technology solutions and training, Non-Medical Help and e-learning for disabled students in higher education. We also work to assist organisations from the public, private and non-profit sectors to embrace diversity in all its forms and to create cultures of inclusion, equity and belonging through our Diversity, Equity and Inclusion (DEI) consultancy.

# Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk:

- We limit the geographical scope of our sites to the UK mainland and to ensure optimum control of our sites and people.
- Where possible we build long standing relationships with our suppliers and who understand, through our values, our expectations of business behaviour.
- If we use third party suppliers for products, we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We have appropriate policies in place to encourage the reporting of any concerns from our employers and any employees raising concerns.

Please see below for information on these policies.

## Supply Chain

We consider ourselves low risk of modern slavery in our business and supply chains.

eQS standard terms and conditions for the purchase of goods and services require suppliers to comply with the Modern Slavery Act 2015 and allow for termination in the event of non-compliance. The overall risk of modern slavery in our supply chain remains low since the majority of our work is to provide training and support and we do not produce an actual physical product.

We do however procure goods and services from a small range of UK and overseas suppliers which includes both Amazon Web Services and Microsoft Azure both of these companies are both based in US, and a limited number of overseas based software suppliers as approved by the Department for Education.

With regards to retail, our trading activities do not generally involve high risk activities such as production and/or sourcing outside of the UK or the EU. All suppliers of products to eQS Group's trading subsidiary, (including IT

hardware and software products) must self-certify against a range of ethical standards, which explicitly includes modern slavery in supply chains, and we request annual updates of their supporting certification.

## Recruitment and our people

We have a variety of policies and procedures in place to ensure compliance with UK employment law, and periodic internal audit reviews provide assurance on the operation of these policies. Our People and Culture Team manage recruitment activities with the recruiting managers through job boards and when applicable third-party employment agencies, to source candidates. We carry out appropriate background checks including Right to Work and role-appropriate Disclosure and Barring Service checks for all fixed term and permanent appointments.

All our employees are UK-based, and we are compliant with the National Living Wage requirements. We minimise the use of agency support and ensure compliance with all aspects of UK employment law.

Regular meetings between management and staff provide structured opportunities to discuss issues affecting staff. Members of staff are also encouraged to provide feedback through an annual Staff Engagement Survey, the results of which feed into operational planning and decision-making.

## Policies

eQS maintains and implements a suite of policies including Modern Slavery and Human Trafficking, Safeguarding, Ethical and Environmental Trading, Recruitment, Procurement, Third Party Involvement and Whistleblowing.

Policies are regularly reviewed and ratified by our Executive Board.

The policies are communicated to all staff to inform them of the standards to which both eQS Group staff and suppliers must adhere, and the mechanisms available to staff and suppliers to report issues/concerns.

## Our future plans

eQS is committed to the continuing evaluation and improvement of our systems and processes. Some of the planned activity for 2025-26 which will contribute towards our anti-slavery commitments includes:

- a sustained focus on safeguarding awareness, including the implementation of a new mandatory eLearning training course which will be rolled out during the beginning of 2025 in order to drive compliance with training completion.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for 2025.



**Andy Gough, Group Managing Director**