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25<sup>TH</sup> NOVEMBER 2024

V1.0

# H3O Digital Modern Slavery Statement for financial year ending 2024



## 1 Overview

This statement is published as required by the Modern Slavery Act 2015. It shows the actions that H3O Digital Limited have taken in the financial year ending 30<sup>th</sup> September 2024 to make sure that slavery and human trafficking are not happening in their supply chains or in any parts of their business. Doing business in an ethical and sustainable way is part of H3O's culture and strategy. We firmly believe that our responsibilities extend beyond our own company, and we work hard to uphold our values in the relations with all our employees, customers and across our supply chain.

This is H3O Digital's first statement and whilst we are legally not obliged to provide a statement, we believe that its good practice to demonstrate the steps we take internally to prevent any contravening of the Modern Slavery Act.

Within H3O Digital we have delivered new training for all employees to help them recognise risks and report concerns about possible modern slavery offences, instigated a Whistleblowing Policy to include specific guidance for modern slavery and created a speak-up function that can be used internally by our employees.

H3O Digital are passionate about leveraging the power of technology to help businesses thrive in the digital era. Our expertise in cutting-edge technologies enables us to deliver innovative solutions tailored to your unique needs. We offer a range of solutions to facilitate digital transformation, including professional services, managed services, and talent acquisition. Our team of experts is dedicated to delivering professional and reliable services that can assist in driving the digital change our customers require.

### 1.1 Organisation Structure

#### 1.1.1 Senior Team and Company Structure

H3O Digital is a privately owned company located in England, it has been established for 7 years and 4 of the 5 original founders make up the current board of directors. Each of the directors are tasked with managing separate areas of the business and each take responsibility to ensure that the business remains compliant with the Modern Slavery Act.



## 1.1.2 Customers and Suppliers

All but one of our customers are located in the United Kingdom (UK) (the other is in the USA) and most of our suppliers are also UK based, there is a small percentage of software suppliers that are based in the EU. Subcontracting is the largest source of procurement spend at circa 90% all of which is UK based.

We believe that the risk to our business is low, however we have the process in places so that as we grow, we can use these to maintain our compliance.

## 1.2 Policies

H3O Digital is committed to acting ethically and with integrity in all of its business relationships and ensure slavery and human trafficking does not take place anywhere in the business or supply chains.

Our Code of Conduct, along with our Company Handbook detail the policies in relation to ethics, anti-corruption and bribery. We perform an annual review of the anti-slavery internal controls during the year to identify, assessing and monitoring potential risk areas in the supply chains, and subsequently mitigate the risk of slavery and human trafficking occurring in the supply chains.

Our Anti-Bribery and Corruption Policy, together with our Whistleblowing Policy, ensures all staff know what is expected of them, and also encourages them to speak up and report any potential wrongdoing.

## 1.3 Due diligence processes for slavery and human trafficking

Within H3O Digital we have a training policy for all employees and standard procedures to ensure compliance. We maintain a register of all our suppliers along with records of their compliance with the Act. We update this register on a regular basis and take any necessary action in the event that a supplier doesn't have an up-to-date statement published.

## 1.4 Risk Assessment and Management

While the company considers its exposure to slavery and human trafficking to be limited due to the nature of the industry and location of our business, we do take steps to ensure that such practices do not take place in our business or the businesses of any organisation that supplies goods or services to us. During the last year we have taken step to improve internal processes including the move to a digital ID verification solution to more accurately check the ID of people we work with.



## 1.5 Training

H3O Digital provides training, advice and guidance for all staff, initially as the point their employment begins in the form of induction training and on-going training for existing staff.

For permanent members of staff all training is delivered electronically using our 3<sup>rd</sup> party training provider. The course on Modern Slavery is a mandatory course for all staff.

## 1.6 Goals and KPIs to measure the effectiveness of actions and progress

H3O Digital provides a Whistleblowing Policy that informs and guides employees on the legal and ethical aspects of whistleblowing and how to report any suspected misconduct in the workplace. All employees are encouraged to share any honest concerns about possible criminal, fraudulent or harmful activities and the ways to do so are shared via internal communications.

The Whistleblowing Policy includes clear and specific guidance on modern slavery. We have clearly stated our commitment to tackling modern slavery with our employees and suppliers.

*THIS STATEMENT IS MADE PURSUANT TO SECTION 54(1) OF THE MODERN SLAVERY ACT 2015 AND CONSTITUTES THE COMPANY'S  
SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDING 30TH SEPTEMBER 2024.*

*SIGNED BY DUNCAN SACKFIELD AND NEIL MIDLANE, DIRECTORS, ON BEHALF OF H3O DIGITAL LIMITED.*

*N Midlane*

Neil Midlane  
CEO

*D Sackfield*

Duncan Sackfield  
COO