

Modern Slavery and Human Trafficking Statement

Published July 2026. Approved by the Directors July 2026.

1. Introduction and basis of this statement

Northdoor plc is committed to acting ethically and with integrity in all of our business dealings, and to putting in place effective systems and controls to ensure that modern slavery and human trafficking take place nowhere in our own business or in our supply chains.

Section 54 of the Modern Slavery Act 2015 requires commercial organisations carrying on business in the United Kingdom with an annual turnover of £36 million or more to publish an annual slavery and human trafficking statement. Northdoor plc's annual turnover falls below that threshold, and we are therefore not legally required to publish a statement under section 54.

We publish this statement voluntarily. We do so because many of our clients operate in regulated sectors, including financial services and insurance, and rightly expect their technology suppliers to demonstrate the same standards of supply chain transparency that apply to them, and because we ask the same of our own suppliers.

This statement has been prepared with reference to the Home Office statutory guidance, Transparency in supply chains: a practical guide, and addresses each of the areas set out in section 54(5) of the Act.

This statement relates to Northdoor plc and all of its operations.

2. Our organisation, structure and business

Northdoor plc is a company registered in England and Wales (company number **02192480**) with its registered office at **Bentima House, 168-172 Old Street, London, EC1V 9BP**.

We are an information technology consultancy and managed services provider. We design, implement and manage Microsoft and IBM technology, including cloud infrastructure management, modern workplace services, cyber security, data management and application support, for clients principally located in the United Kingdom.

We employ approximately 55 people. All of our employees are based in the United Kingdom and work from our London office or remotely from their homes. We do not own or operate manufacturing facilities, we do not operate in the agricultural, construction, extractive or hospitality sectors, and we do not have overseas operating subsidiaries or joint ventures.

3. Our supply chains

Our supply chain is typical of a professional services and technology business. The principal categories of expenditure are:

- Software vendors and licensing distributors, including Microsoft, IBM and their authorised distribution partners

- Cloud platform, hosting and data centre providers
- Hardware manufacturers, resellers and logistics providers supplying end user devices, servers, storage and networking equipment
- Subcontracted technical specialists and contract resource, including resource supplied through agencies
- Recruitment agencies and background screening providers
- Professional advisers, including legal, accountancy, audit, banking and insurance
- Office and facilities services, including cleaning, security, catering, maintenance and waste management at our leased premises
- Travel, hospitality, marketing and corporate services

The overwhelming majority of our direct suppliers are established businesses incorporated in the United Kingdom, the European Union or the United States, and a significant proportion are themselves subject to section 54 of the Act and publish their own statements.

4. Risk assessment

4.1 Risk within our own operations

We assess the risk of modern slavery within our own operations as low.

Our workforce is United Kingdom based, professionally skilled, directly employed on written contracts of employment, paid at or above the National Living Wage, and free to terminate employment on notice. Right to work verification is completed and documented before any individual starts work. All employees are paid by bank transfer into an account held in their own name, no individual is charged a fee to obtain work with us, and we do not retain identity documents.

4.2 Risk within our supply chain

We assess the greater residual risk as sitting in the indirect and lower tiers of our supply chain, in particular:

- The manufacture and assembly of information technology hardware and components, and the extraction and processing of the raw materials used in them, where supply chains are long, multi-tiered, geographically dispersed and recognised internationally as higher risk
- Facilities services such as cleaning, security and catering, which are recognised as higher risk within the United Kingdom labour market
- Agency supplied and subcontracted labour, where terms of engagement are set by a third party rather than by us
- Construction, fit out and maintenance works at premises and data centres operated by our suppliers

We are realistic about the limits of our influence. As a mid-sized purchaser, we contract predominantly with large global vendors and distributors, and our commercial leverage over their tier two and tier three suppliers is limited. Our approach is therefore weighted towards careful supplier selection, clear contractual requirements, and informed reliance on the published due diligence and audit programmes of the major vendors from whom we buy.

5. Policies

The following policies support our approach to modern slavery and human trafficking:

- Modern Slavery and Human Trafficking Policy
- Whistleblowing Policy, under which employees, workers, contractors and suppliers may raise concerns in confidence and without fear of detriment
- Recruitment and Right to Work Policy
- Supplier Code of Conduct and standard procurement terms
- Anti Bribery and Corruption Policy
- Equality, Diversity and Inclusion Policy
- Employee Handbook, Code of Conduct and Disciplinary and Grievance Procedures

These policies are approved by the Board, issued to all employees via our internal portal site, and reviewed at least annually.

6. Due diligence

The measures we take to identify and mitigate the risk of modern slavery include:

- Documented right to work checks on every employee before their start date, retained in accordance with Home Office guidance
- Verification that every worker is paid at least the National Living Wage, directly into a nominated personal bank account, with no unlawful deductions
- Modern slavery provisions in our standard supplier and subcontractor terms, requiring compliance with the Modern Slavery Act 2015, prohibiting forced, bonded, compulsory and child labour, requiring the supplier to impose equivalent obligations on its own supply chain, and permitting termination for breach
- Screening of new suppliers at onboarding, with enhanced enquiry for categories identified as higher risk, including review of the supplier's published modern slavery statement where it is subject to section 54
- Sourcing of hardware and licensing through established, audited authorised distribution channels rather than through unverified or grey market sources
- A requirement that recruitment agencies confirm compliance with the Modern Slavery Act 2015, the Employment Agencies Act 1973 and associated conduct regulations, and, where their activities fall within scope, that they hold a licence issued by the Gangmasters and Labour Abuse Authority
- A confidential reporting route for any concern about exploitation, whether within our business or at a client site, escalated to the relevant head of department and reported to the Board

Where we tender for public sector work, including through Crown Commercial Service frameworks such as G-Cloud, we comply with the modern slavery requirements set out in the applicable Procurement Policy Notes and provide the assurance evidence requested by the contracting authority.

Any credible report or suspicion of modern slavery would be escalated immediately to the Board and, where appropriate, referred to the police, the Modern Slavery and Exploitation Helpline or the

Gangmasters and Labour Abuse Authority. We would not treat the matter as a purely commercial issue to be resolved by terminating a contract.

7. Training and awareness

All employees receive awareness training covering modern slavery and human trafficking as part of induction and subsequent refresher compliance training, delivered alongside our information security, data protection and anti-bribery training. The training explains what modern slavery is, the indicators that may suggest exploitation, and how to raise a concern.

Employees with responsibility for procurement, recruitment, subcontracting and supplier management receive additional guidance appropriate to their role.

8. Measuring effectiveness

We use the following indicators to assess the effectiveness of the steps we have taken:

- Proportion of employees completing modern slavery awareness training during the year, against a target of 100 per cent
- Proportion of new employees for whom right to work checks were completed and recorded before their start date, against a target of 100 per cent
- Proportion of new and renewed supplier contracts incorporating our modern slavery provisions
- Proportion of suppliers in categories identified as higher risk that have been assessed during the year
- Number of concerns raised through our whistleblowing or other reporting channels, and the outcome of each

During the financial year ended 30th June 2026 we received no reports and identified no instances of modern slavery or human trafficking within our business or our supply chain.

9. Approval

This statement is made on a voluntary basis, having regard to section 54 of the Modern Slavery Act 2015, and constitutes Northdoor plc's slavery and human trafficking statement.

It was approved by the Board of Directors of Northdoor plc.

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