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24x7 Group Holdings Ltd organisation  
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# **Human Trafficking & Modern Slavery Statement**

**January 2025**

# Modern anti-slavery and human trafficking statement

## Opening statement from senior management

This statement confirms that 24x7 Ltd is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers, contractors, and other business partners. 24x7 Ltd takes its responsibilities seriously and this statement is in accordance with the requirements specified in section 54 (1) of the Modern Slavery Act 2015 (the Act).

## Company Structure and supply chains

24x7 Ltd are a UK based Company providing specialist transport services for schools, young persons with special needs and social care establishments.

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## Company Policy on Slavery and human trafficking

We are committed to improving our practices to combat slavery and human trafficking. We support the UK Government's action plan to implement the UN Guiding Principles on Business and Human Rights. In employing this approach, 24x7 LTD supports the Base Code of Ethical Trading Initiative. The Code is internationally recognised and requires that:

- Employment is freely chosen.
- Freedom of association and, the right to collective bargaining is respected.
- Working conditions are safe and hygienic.
- Child labour shall not be used;
- Living wages are paid.
- Working hours are not excessive.
- No Discrimination is practiced.
- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.

## **Scope of the Modern Slavery Act 2015**

24x7 Ltd will ensure that the aims of the Act are enshrined within its business, its policies and practices. As a professional services organisation, we consider the risk of Modern Slavery existing within our business to be low and have no reported cases within the last FY. We continue to assess, monitor, and mitigate risks relating to slavery and human trafficking on a group wide basis and require all associates to complete Anti-slavery and human trafficking training upon induction. We also have a Whistleblowing Policy to encourage and protect those who come forward in complete confidence.

## **Training**

Raising colleagues' awareness of trafficking and modern slavery is key to identifying and helping to prevent modern slavery and human trafficking. Awareness training is provided to all staff members upon induction and a refresher is required annually.

## **Board approval**

The 24x7 Ltd Board recognises the importance of the provisions of the Modern Slavery act 2015 and aim to ensure that slavery and human trafficking have no part in the Group's operations and supply chain. The Group has always been vigilant about the welfare of our colleagues, clients and suppliers and aims to be transparent in it's practices. The directors welcome the opportunity to stake its firm commitment to a zero -tolerance approach to modern slavery and human trafficking.



Andy Mahoney  
Managing Director  
24x7 Ltd.  
7/1/2025

# Trafficking Policy

## 1. Policy Statement

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

## 2. Responsibility for the policy

- 2.1. The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2. The Operations Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3. Management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.4. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the compliance manager.

### 3. Compliance with the policy

- 3.1. You must ensure that you read, understand and comply with this policy.
- 3.2. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3. You must notify your manager OR the Operations Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 3.4. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager OR the Operations Director OR report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.6. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Operations Director.
- 3.7. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in your Staff Handbook.

#### 4. Communication and awareness of this policy

4.1. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

4.2. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### 5. Breaches of this policy

5.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct

5.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Name            Andy Mahoney

Signed

A handwritten signature in black ink, appearing to be 'A Mahoney', written over a horizontal line.

Date            7/1/2025

Position        Director

