

## **Penta Consulting Slavery and Human Trafficking Statement**

### **Introduction**

Penta Consulting Group Ltd and its subsidiary companies (“Penta”), specialists in delivering Professional Services and Managed Services, are fully committed to preventing slavery and human trafficking in all aspects of our business and supply chains. We recognise our responsibility to uphold human rights and to take a proactive approach in identifying and mitigating modern slavery risks.

We are committed to continuously improving our practices to prevent slavery and human trafficking. This includes strengthening supply chain due diligence procedures and appropriate checks, ensuring that all individuals working in our supply chains are treated with dignity, respect, and fairness.

### **Our Supply Chain**

Our supply chain includes:

- Independent contractors
- Management compliance companies
- Job boards
- Property and media providers
- IT service providers

Our clients include:

- Technical vendors
- Telecommunications providers
- Enterprise businesses

We recognise that each of these relationships carries potential risks, and we are committed to working only with partners who share our values.

### **Our Policies on Slavery and Human Trafficking**

We have appropriate policies in place that underpin our commitment to zero tolerance of modern slavery or human trafficking in our supply chain or in any part of our business. We continuously review and update all our policies.

### **Due Diligence**

We are continually improving our staff training to ensure better understanding of the risks of modern slavery and human trafficking in our supply chain, and the risk to our business. We have appropriate processes and procedures in place to identify, assess, mitigate, and monitor potential risk areas both within our business and supply chains, including slavery and human trafficking risks.

Our due diligence procedures:

All employees have a written contract of employment which includes a guarantee of pay and benefits, along with a reasonable period of notice, which enables them to resign and leave freely.

We have a clear Whistleblowing Policy, which sets out the whistleblowing procedure. Whistleblowers are protected from retribution when acting under this policy.

Contractors within our supply chain are provided with appropriate terms within contractual documents, obliging suppliers and contractors to comply with the Modern Slavery Act and reserve the right for Penta to audit suppliers and contractors where considered appropriate.

Business relationships are reviewed on an ongoing basis, and commitments are clearly stated within the contracts. Key stakeholders are trained to raise any concerns to HR.

All employees are signposted to our relevant and related policies to ensure they are aware of the risks of modern slavery and human trafficking. We are continually improving our staff training to ensure better understanding of the risks of modern slavery and human trafficking in our supply chain, and the risk to our business.

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 an employee believes that they have suffered any such treatment, they are encouraged to inform HR immediately.

## **Risk and Compliance**

We recognise the potential risks associated with operating in jurisdictions where human rights protections may be limited. As part of our commitment to ethical business practices, we expect our suppliers to have suitable modern slavery and human trafficking policies and procedures in place within their own business.

Failure by any suppliers to meet our standards or comply with our policies, would result in immediate termination of our business relationship.

## **Governance and Accountability**

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

This policy is reviewed at least annually with additional monitoring, auditing and training to ensure compliance.



Approved by the Board of Directors of Penta Consulting Group Limited

Paul Clark  
Chairman

29 April 2026