



Modern Slavery Statement

v1.0

Document revisions

Revision	Date	Description of change(s)	Requested	Approved
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The Transfer360 Ltd ("T360") slavery and human trafficking statement is made pursuant to Section 54 of the Modern Slavery Act 2015 'Transparency in Supply Chains' and was approved and signed by the Directors.

The statement will be updated annually.

Modern slavery is a crime where people are exploited and treated as commodities for commercial gain. It includes slavery, servitude, forced labour and human trafficking. It is a global problem of which the full extent is unknown.

Whilst our current revenues do not meet the threshold to make a policy of this nature compulsory for the business, we have implemented this policy due to the severity of the subject matter.

Our Business

T360 is a software house and is a limited company registered in England and Wales (registered number 13840059). We have been delivering our services to businesses since 2022 and our clients are serviced by one main trading style; Transfer360.

We operate as one team and our main office is in London, United Kingdom. We also have several key personnel who work off-site.

Our supply chain entails the purchasing of goods and services that support the operations of our offices and services to our clients.

These include office supplies, technical services, Solicitors, marketing materials, ICT hardware and software.

Our policies and commitments

Operating with integrity governs our approach and therefore our aspiration to be recognised by our stakeholders as an organisation which is a responsible corporate citizen in all our relationships. Our responsible business policies include:

- Whistleblowing policy
- Anti-bribery policy
- Supplier code of conduct
- Health and safety policy

We are an equal opportunities employer.

Our employee policies and procedures set out our requirements on such issues as disciplinary, grievance, equal opportunities, flexible working, harassment and bullying, home and mobile working and recruitment best practice.

We expect all employees to conduct business with honesty and integrity and we have a zero-tolerance approach to bribery and corruption with policies and regular training undertaken on this and other such issues as anti-money laundering, gifts and hospitality.

Our whistleblowing policy sets out the process for reporting any concerns about wrongdoing or breaches of policies including forced or compulsory labour or human trafficking.

We expect our suppliers to share our commitments and approach and by collaborative working we believe we can jointly have a positive impact on society. Our stance on this underpins our supplier selection process and details a range of environmental, social and ethical issues including slavery and human trafficking for consideration as part of the supplier selection process.

Our suppliers are invited to sign up to our Supplier Code of Conduct covering laws and regulations, under age and forced labour, freedom of association, discrimination, wages and benefits, working hours, healthy and safe working conditions, environment, business integrity, discipline and grievances.

Due diligence and risk assessment - employees

Our employment strategy is based on attracting, developing and retaining the best talent by reinforcing our values and providing a stimulating and rewarding work environment. We recognise everyone is unique and has special contributions to make in delivering the T360 strategy. Employee engagement is at the heart of our approach and we want to inspire and empower our people to use their talents positively.

Our recruitment and employment procedures include appropriate pre-employment screening of all staff to determine right to work in the UK where our office is based.

Due diligence and risk assessment – suppliers

Nominated individuals in our business have been briefed on our policy.

This details:

- background to the scale of the problem globally, regulations and our legal requirements;
- guidance on how to assess level of risk and therefore selection of suppliers for engagement on an annual basis or if a risk arises that requires investigation. Priority considerations can include: sourcing from or operating in countries of high risk;
 - high risk sectors where cases are frequently reported;
 - labour intensive stages of supply chain where the end product is cheap;
 - subcontracted labour forces;
 - low skill employment used;
 - transaction risks;
 - significant values of spend or significant strategic value;
 - contracts coming up for renewal;
 - material change in the supplier's business e.g. merger, acquisition, significant operational changes;
 - if an incident has occurred or a potential incident identified; and
 - previous responses warranting follow up
- invitation for suppliers to sign up to the T360 supplier code of conduct and to provide information on:
 - countries goods/services sourced from;
 - review of operations and supply chain during last twelve months;
 - any instances of slavery/human trafficking identified;

- any remediation programme in place if instances found;
- any third-party accreditations in place to check slavery/human does not exist in supply chain;
- details of supplier's slavery and human trafficking statement if an obligated organisation; and
- approaches to other high-risk sustainability issues
- employee and employer procedure in the event of an incident of slavery or human trafficking identified and working with supplier to help victims and mitigate risk in the future.

We have not identified any internal business procedures that could make demands of suppliers or contractors that might lead them to violate human rights and will keep this under review.

T360 has not been informed of any incidents of slavery or trafficking during the year but will investigate any allegations should they arise and take appropriate action accordingly.

This policy and statement were approved by the Directors and signed by:

Richard Williams
Director
Transfer360 Limited