

## Modern Slavery Statement

**Company Name:** Mercator IT Solutions Ltd (Reg. No. 05755983)  
**Financial Year End:** 31/03/2026  
**Date completed:** 13/04/2026  
**Completed by:** Sarah Bennett, COO  
**Signed off by:** Marc Churchouse, CEO, 13/04/2026  
**Review date:** 30/04/2027

### Organisation Structure & Supply Chains

Mercator IT Solutions Ltd (hereinafter referred to as Mercator) operates in the Digital/IT/ Consultancy sectors. Work is project-based and not seasonal.

Mercator currently sources 98.8% of its services from the UK and 1.17% of its services from Europe.

### Mercator has the following suppliers:

- Software providers
- Cloud service providers
- Office service providers e.g. stationery, furniture, waste collection etc.
- Subcontractors – engaged in providing consultancy services to our clients

Mercator supplies end-to-end digital consultancy services to public and private sector clients. We utilise a combination of our own permanent staff and subcontractors to complete outcomes/deliverables. Mercator works directly with recipient clients as well as via ecosystems through larger organisations.

### Policies Relating to Slavery & Human Trafficking

Mercator has a Labour Standards Policy which aims to uphold the following principles:

- Employment should be freely chosen
- Freedom of movement is respected
- Freedom of association and the right to collective bargaining are respected
- Where applicable, regular employment is provided
- No harsh or inhumane treatment is allowed
- Child labour shall not be used
- No worker paid recruitment fees are charged
- There will be no compulsory overtime
- Working hours are not excessive
- Workers will retain their original ID documentation
- Working conditions are safe and hygienic
- Remuneration is fair and meets the legal requirements; workers have clear information about their work
- No discrimination is practised
- Entitlement to work is verified
- Labour providers are checked
- Working environments meet legal requirements

We have a clearly documented Whistle Blowing process in the employee handbook so that any concerns surrounding engagement in non-ethical behaviour can be highlighted with the appropriate management.

### Due Diligence

In order to adhere to our Labour Standards Policy, Mercator has taken the following steps:

- Conducted a risk assessment
- Provided staff training
- Included contractual clauses relating to the Modern Slavery Act in subcontract agreements

- Checked suppliers with a turnover of more than £36m have registered their Modern Slavery Statement on the government registry

Employees who are concerned about a worker will report any concern in the first instance to their Line Manager or the Community team, this will then be escalated to the COO. We also have a dedicated HR email address which employees can use if they have any concerns.

Mercator also encourages its Subcontractors to be vigilant in modern slavery; in the first instance they would report concerns to their Engagement Manager and where necessary this would be further escalated to the COO.

Additionally, anyone working for a client (Mercator employee or Subcontractor) will also have to adhere to any codes of conduct or labour standards policies provided by the client and applicable to third parties.

### **Risk Assessment & Management**

Mercator has the following suppliers:

- Software providers
- Cloud service providers
- Office service providers e.g. stationery, furniture, waste collection etc.
- Subcontractors – engaged in providing consultancy services to our clients

The greatest risk lies in its Subcontractors as these account for the largest spend.

### **Performance Indicators:**

Mercator's Performance Indicators with its clients focus on delivering quality and highly skilled services (often not available within the client itself). The majority of our client contracts are won through rigorous tender processes and are largely based on quality, ability to deliver, and social value. Price is a factor but we have often not been the cheapest bidder. By not focussing on being the cheapest supplier we are less likely to make ourselves vulnerable to modern slavery. Our employees and subcontractors are also required to be highly skilled in their fields.

- 96% of employees have passed their Modern Slavery module
- There have been 0 concerns raised regarding other employees or subcontractors in relation to modern slavery in 2025/2026

### **Training**

We ask everyone to complete 15 HR courses (Line Managers have an extra 6 courses) upon starting work with Mercator. One of the courses is "Business Ethics" and Modern Slavery is one of the topics covered. In addition, all employees have been provided with the company Labour Standards Policy and information on the "red flags" for modern slavery has been distributed.

All workers providing services to Mercator through a subcontractor go through a vetting process in order to be assigned to a client. The minimum standard for vetting is BPSS including:

- Confirmation of right to work in the UK through TrustID
- Confirmation of identity using 2 forms of identity document
- Confirmation/proof of address
- Confirmation of place of birth, nationality, date of birth, national insurance number
- Address history for the previous 5 years
- 3 years of continuous employment history, verified with independent references (from HR/agency only)
- Adequate explanation of gaps in employment
- Basic DBS check plus any additional criminal records checks from other countries where the worker has been outside of the UK for more than 6 months in the past 3 years

The Vetting Team, whilst focusing on obtaining all the relevant information for their checks, are highly tuned to unusual behaviour which could coincide with modern slavery. Warning signs which may become evident in the vetting process are:

- Unable to verify right to work through TrustID system
- Difficulty in obtaining the correct identity and proof of address documents/discrepancies in the addresses being provided verbally/on forms
- Difficulty in obtaining employment references/different contacts being provided for the references/inadequate references being obtained
- Vague/inconsistent explanations in gaps in employment history
- General difficulty in obtaining information quickly/accurately, unusual manner from worker

By following their vetting process the Vetting Team check for any International Labour Organisation (ILO) Indicators of forced Labour including:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

In addition to the initial checks performed by the Vetting Team, monthly check-ins are done by our Engagement Team. Many of our workers work remotely so the check-ins are required for health and well-being but as with the vetting team, the engagement team are able to use these catch-ups to spot:

- Unusual or nervous behaviour (check-ins are not organised in advance)
- Poor/unsuitable working environment
- Physical red flags (looking malnourished or unkempt, any signs of injury/anxiety)

### **Governance and Compliance:**

This statement is made pursuant to the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2026. It has been signed off by Marc Churchouse, CEO, on 13th April 2026.