

Mantis Advisory Limited Modern Slavery and Human Trafficking Statement

Introduction

This Modern Slavery statement sets down Mantis Advisory Limited (“Mantis” or the “Company”) commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report on their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Mantis which are as follows:

It is a small commercial consultancy company, providing expertise via guidance, advice and resource-based support to customers.

The Company currently operates in the following countries:

In the United Kingdom (UK), providing consultative services to customers based in the UK and mainland Europe.

The following is the process by which the Company assesses whether activities or countries are high risk in relation to modern slavery or human trafficking:

- By using the UK government's Modern Slavery Assessment Tool (MSAT),
- By checking the Global Slavery Index for high-risk countries.
- By conducting questionnaires, reviewing company policies, and if required - monitoring sectors with high migrant or vulnerable labour.

Responsibility for the Company’s anti-slavery initiatives is as follows:

- 1.1 Policies: The Directors of the Company are responsible for creating and reviewing policies. The process by which policies are developed is by looking at best practice and most robust policy drafting available and adapting to the needs of the Company.
- 1.2 Risk assessments: The Company Directors are responsible for risk assessments in respect of human rights by a process of assessment –

considering risk by resource requirement, and engagement and subsequent terms of agreement with other companies in the course of the Company's business.

- 1.3 Due diligence: The Company Directors are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to review and sign off on all related policies and terms of reference.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations. The policies below are in place and signed off (as read and understood) by all Company staff members:

- 2.1 **Whistleblowing policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Company Code of Conduct** - The Code of Conduct sets down the actions and behaviors expected of employees when representing the Company.
- 2.3 **Corporate Social Responsibility (CSR) Policy** - The Company's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers and customers and regularly reviews its existing supplier & customer lists. The Company's due diligence process includes a review of the supplier/customer ownership from a country and affiliation perspective, checking against possible risks or known slavery or human trafficking issues. We complete this due diligence so we can building long-standing relationships with suppliers / customers, making it clear of our expectations of those businesses, evaluating the modern slavery and human trafficking risks of each business, invoking sanctions against companies that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.



Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains. We do this by requiring all relevant staff to review and sign off on all appropriate policies. By using structured due diligence when selecting / considering new suppliers or customers to work with. Plus reviewing rolling business relationships, (suppliers or customers), by way of checking their current (related) internal policies, business affiliations, business' countries of origin, etc.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Company Directors and management team endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name / Title: Richard Warwick-Smith & Sophie Hilldon (Directors)

Position: Mantis Advisory Limited

Date: 13-Feb-2025