

Nocturna IT Ltd – Modern Slavery Statement			
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## Modern Slavery Statement

### Introduction

This Modern Slavery Statement is published in accordance with section 54 of the Modern Slavery Act 2015. It sets out the approach taken by Nocturna IT Ltd (referred to as “Nocturna IT”) to prevent and address modern slavery and human trafficking within its business operations and supply chains.

Nocturna IT is committed to seeking to prevent all forms of modern slavery, forced labour, compulsory labour, child labour, and human trafficking. We are committed to acting ethically, responsibly, and transparently, and to upholding internationally recognised human rights standards in all aspects of our operations.

This statement applies to the director of Nocturna IT and sets out the standards and expectations we have of contractors, suppliers, partners, and other third parties acting on behalf of Nocturna IT.

### About Nocturna IT

Nocturna IT is a UK-based provider of out-of-hours IT support services. We operate as an extension of our clients’ internal IT or managed service provider (MSP) teams, working strictly within each client’s established processes, policies, and governance frameworks. Ownership, control, and accountability for systems, assets, and technology decisions remain with our clients at all times.

Nocturna IT does not sell hardware, manufacture products, or provide software. Our activities are limited to the provision of support services delivered by the director and, where applicable, approved contractors or partners.

### Organisation Structure and Supply Chains

Nocturna IT operates primarily within the United Kingdom and is currently led by a single director, who retains full responsibility for operational oversight, compliance, and governance.

Our supply chain is limited and low complexity, and includes:

- Recruitment and employment agencies
- Professional services and specialist subcontractors

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- Facilities, IT, and business support service providers

We do not operate manufacturing facilities, logistics operations, or global hardware supply chains. As a result, our overall exposure to modern slavery risk is considered low based on the nature and scale of our activities; however, we remain vigilant and apply proportionate controls.

## Governance

Our commitment to preventing modern slavery is embedded within our governance arrangements and supported by proportionate policies, procedures, and contractual expectations appropriate to the size and nature of the business.

Overall responsibility for this statement and its implementation rests with the Managing Director of Nocturna IT.

## Due Diligence and Risk Management

### Supplier Due Diligence

We apply appropriate and proportionate due diligence measures when engaging suppliers and third parties. These measures are tailored to the nature of the services provided and may include:

- Seeking reasonable assurances from suppliers regarding compliance with applicable employment and labour laws
- Requests for confirmation of alignment with the Modern Slavery Act 2015
- Where applicable, contractual expectations relating to ethical conduct and labour standards
- Risk-based consideration of recruitment agencies and subcontractors

We reserve the right to request further information or assurance where potential risks are identified and to terminate relationships where serious concerns or breaches arise.

## Risk Assessment

The primary areas of potential risk for Nocturna IT relate to:

- Use of third-party recruitment or labour providers
- Subcontracted specialist services

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To mitigate these risks, we engage reputable suppliers, conduct proportionate checks during onboarding, and retain the ability to raise concerns or take action where risks are identified.

## Our People and Employment Practices

At present, Nocturna IT has no direct employees and is operated by a single director.

Where Nocturna IT engages contractors or third parties, we are committed to ensuring fair, lawful, and transparent working practices. We expect, to the extent reasonably practicable, that:

- Individuals have the legal right to work in the United Kingdom
- Engagement arrangements are free from coercion, exploitation, or abuse
- Applicable employment and labour laws are complied with by relevant suppliers and agencies
- Health, safety, and wellbeing standards are upheld

Nocturna IT seeks to prevent any form of forced labour, exploitation, or human rights abuse within its operations and supply chains.

## Training and Awareness

The director maintains appropriate awareness of modern slavery and human trafficking risks, proportionate to the nature and scale of the business, including how to identify potential indicators and how to report concerns.

Where relevant, awareness of modern slavery risks may be communicated during onboarding or engagement discussions.

## Reporting and Whistleblowing

We encourage the director, contractors, suppliers, and other third parties to raise concerns regarding suspected modern slavery or unethical conduct.

Concerns may be reported through line management or through appropriate reporting channels made available by Nocturna IT. All reports are handled confidentially, reviewed and considered appropriately, and without retaliation against individuals who raise concerns in good faith.

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Where criminal activity is suspected, Nocturna IT will cooperate fully with relevant authorities.

## **Effectiveness and Continuous Improvement**

We are committed to continuous improvement in managing modern slavery risks. Nocturna IT will:

- Review and maintain proportionate supplier due diligence processes
- Periodically review training and awareness materials
- Review this statement periodically to ensure ongoing compliance and effectiveness

No incidents of modern slavery or human trafficking have been identified within Nocturna IT's operations or supply chain based on the information reasonably available to date.

This statement is based on information reasonably available to Nocturna IT at the time of publication and reflects a proportionate approach aligned to the size, structure, and nature of the business.

## **Approval**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the management of Nocturna IT. This statement is provided for informational purposes only and does not create contractual or other legal obligations.