

Modern Slavery Policy



Modern Slavery and Human Trafficking Statement

Causality.IT Ltd

For the financial year ending 31 March 2026

(Prepared in accordance with section 54 of the Modern Slavery Act 2015)

This statement sets out the steps that Causality.IT Ltd has taken to prevent modern slavery and human trafficking within its business and supply chains. It is published in compliance with section 54 of the Modern Slavery Act 2015 and applies to all operations of Causality.IT Ltd.

This statement has been approved by the Board of Directors and is signed by:

Simon Dowdall

Director

Causality.IT Ltd

Date: 27.01.2026

1. Organisation Structure, Business and Supply Chains

(Requirement a)

Causality.IT Ltd is a small UK-based IT consultancy specialising in the design, delivery, and support of IT infrastructure and cloud solutions, primarily to public sector clients. We are headquartered in London and operate mainly across the South East of England, delivering infrastructure support, deployment, and cloud implementation projects.

The company currently employs two permanent staff members and engages a limited number of trusted contractors where required for specialist delivery capacity.

Our supply chain is relatively small and primarily consists of:

- Hardware and networking equipment suppliers
- Software and cloud service providers
- Telecommunications and connectivity providers
- Professional services and specialist subcontractors
- Office and facilities service providers

Where possible, we engage established UK-based suppliers with transparent labour practices and strong compliance standards. We seek to limit the size of our supplier network and favour long-term supplier relationships to maintain oversight, consistency, and ethical integrity throughout our supply chain.

Causality.IT Ltd does not currently operate through subsidiary companies. This statement therefore covers Causality.IT Ltd only.

2. Policies in Relation to Slavery and Human Trafficking

(Requirement b)

Causality.IT Ltd is committed to preventing modern slavery and human trafficking in all its business activities and supply chains. We take a zero-tolerance approach to slavery, servitude, forced or compulsory labour, and human trafficking.

Our **Slavery and Human Trafficking Policy** forms part of our wider corporate governance and ethical framework and is supported by the following principles:

- Compliance with all applicable UK legislation, including the Modern Slavery Act 2015
- Fair treatment, dignity, and respect for all workers
- Transparent and ethical sourcing and procurement practices
- Continuous improvement in identifying and mitigating modern slavery risks

Our policy sets objectives across short, medium, and long-term horizons under the following themes:

- **Relationships:** Strengthening supplier engagement and accountability
- **Feedback:** Establishing grievance and whistleblowing mechanisms
- **Knowledge:** Improving data collection, traceability, and supplier transparency
- **Third-party engagement:** Working with auditors, industry bodies, and ethical trade organisations
- **Measurable change:** Developing and monitoring key performance indicators
- **Supplier collaboration:** Encouraging joint action on labour standards
- **Incentivisation:** Promoting ethical behaviour through contractual and commercial measures
- **Accountability:** Enabling staff and suppliers to raise concerns safely and confidentially

3. Due Diligence Processes

(Requirement c)

We recognise that our principal exposure to modern slavery risk lies within external supply chains rather than our direct workforce.

Our due diligence processes include:

- Conducting risk-based supplier assessments prior to onboarding
- Prioritising suppliers that publish modern slavery statements and ethical policies
- Requiring contractual commitments to comply with UK labour laws and ethical standards
- Reviewing supplier certifications, audits, and compliance documentation where available
- Limiting procurement to reputable suppliers with established compliance frameworks

Where concerns are identified, we reserve the right to:

- Require corrective action plans
- Suspend new business
- Terminate contracts for serious or unresolved breaches

4. Risk Areas and Risk Management

(Requirement d)

Given the nature of our business, the highest potential risk areas are:

- Manufacturing supply chains for IT hardware and networking equipment
- Overseas software development and support services
- Telecommunications infrastructure supply chains

To assess and manage these risks, we:

- Focus procurement on UK-based and tier-one global suppliers with established compliance regimes
- Avoid suppliers operating in high-risk jurisdictions where possible
- Monitor public disclosures, sanctions lists, and regulatory actions relating to key suppliers
- Limit engagement with opaque subcontracting arrangements

The overall risk of modern slavery within our direct business operations is assessed as low, due to our small workforce and UK-based employment model.

5. Effectiveness and Performance Indicators

(Requirement e)

We measure the effectiveness of our approach using the following indicators:

- Completion rates of modern slavery awareness training
- Number of modern slavery incidents or allegations reported
- Number of suppliers reviewed for ethical compliance
- Number of supplier contracts containing modern slavery clauses
- Corrective actions raised and closed

To date:

- No incidents of modern slavery have been identified within our business or supply chain
- All active suppliers are UK-based or operate under internationally recognised compliance frameworks

These indicators are reviewed annually and will be refined as the business grows.

6. Training and Capacity Building

(Requirement f)

All employees receive modern slavery awareness training as part of onboarding. This training covers:

- Definitions and indicators of modern slavery
- Legal obligations under the Modern Slavery Act 2015
- How to raise concerns or report suspicions
- Our internal policies and supplier expectations

Refresher training is provided periodically, and updates are issued when regulatory guidance or internal policies change.

7. Continuous Improvement

Causality.IT Ltd is committed to continuous improvement in tackling modern slavery. Over the next 12 months we will:

- Formalise supplier onboarding questionnaires covering labour standards
 - Expand contractual modern slavery clauses
 - Improve documentation and audit trails
 - Strengthen internal reporting and escalation procedures
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Publication

This statement is published on the UK website of Causality.IT Ltd and will be reviewed and updated annually.