

## Modern Slavery Statement

We, Codestone Solutions Limited (company number 03478376) incorporated and registered in England and Wales with registered address 2 Nuffield Road, Nuffield Estate, Poole, Dorset, BH17 0RB, acknowledges are responsibilities in relation to tackling modern slavery and complying with the provisions of the Modern Slavery Act 2015 (the Act). We are dedicated to enhancing our practices to combat modern slavery and human trafficking within our internal business operations and supply chain. Our commitment to ethical conduct and integrity is unwavering, and we strive to ensure that our business and supply chain are free from any form of modern slavery or human trafficking.

### Organisation's structure

We are a provider of IT services with over 350 employees. We have specialised experience in ERP, EPM/CPM, and Advanced Analytics, particularly focusing on the Office of the CFO. As the exclusive SAP Gold Partner + Microsoft + CCH Tagetik Platinum Partner in the UK, we offer holistic solutions tailored to business needs. We're the #1 ERP-led digital transformation firm in the UK and Northern Europe and a top 50 Managed Service Provider. We operate from Dorset, Hampshire, London and Surrey.

Our immediate parent company is Codestone Group Limited (company number 06386525) incorporated and registered in England and Wales with registered address and headquarters at 2 Nuffield Road, Nuffield Estate, Poole, Dorset, BH17 0RB. Codestone Group Limited is our immediate parent company.

FPE Fund II LP is our ultimate parent, a limited partnership the registered office of which is 2<sup>nd</sup> Floor, 7 Swallow Street, London, England, W1B 4DE.

### Our supply chains

We maintain straightforward supply chains, primarily involving suppliers who provide professional advice and business services, as well as day-to-day operational support such as facilities management. Given our limited direct involvement in our suppliers' operations, we recognise that the risk of modern slavery and human trafficking is more significant within their operations than within our own. Therefore, we view our due diligence processes as crucial in mitigating these risks. We are committed to ethical operations and expect the same from our suppliers, maintaining a firm stance against modern slavery and human trafficking in all aspects of our business. We will never

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Date	17 <sup>th</sup> October 2024

engage with suppliers who knowingly support or are found to be involved in slavery, servitude, or forced labour.

### Our policies and procedures

We have appropriate policies and procedures in place that underpin our commitment to mitigate the risk of modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to mitigate the risk of modern slavery and human trafficking taking place anywhere in our supply chains.

We also have the following policies and procedures in place relevant to reduce the risk of modern slavery occurring within our business or supply chains, which we continuously review and update:

- Anti-Bribery and Corruption Policy.
- Whistleblowing Policy.
- Responsible business policies and procedures.

### Due diligence processes

We will undertake due diligence to identify and address risks, which may include:

- conducting due diligence questionnaires/assessments for potential suppliers;
- identifying and taking a record of our supplier's Modern Slavery Statements and/or commitments to maintaining an ethical supply chain free of modern slavery; and/or
- reassessment and performance reviews of existing suppliers, in particular those in high-risk areas.

Where we consider that the sector in which a supplier operates as being regarded as having a higher risk of potential for modern slavery in their supply chain, we ask for additional information about the steps they have taken to eliminate modern slavery in their supply chains.

### Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we include robust anti-slavery clauses in our supplier agreements.

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In the performance of their contract with us, we require that our suppliers comply with the Act and immediately report to us any suspected or actual breach of the Act.

### Training

To raise awareness of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We encourage all our staff to report any concerns or suspicions of inappropriate or illegal behaviours in our supply chains in accordance with our Whistleblowing Policy.

### Measuring our effectiveness in combating modern slavery and human trafficking

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Ensuring increased supplier due diligence incorporating modern slavery and human trafficking is carried out in relation to 100% of key suppliers onboarded, or as part of our scheduled on-going supplier governance reviews.
- Assessing outcomes from supplier assessments and due diligence.
- Number of concerns or suspicions raised via whistleblowing or other channels related to modern slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 September 2025.

It was approved by the Board of Codestone Solutions Limited on 17 October 2024.



Darryl Sackett

CEO

Codestone Solutions Limited

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