**Modern Slavery Policy Statement**

**Introduction**

Espria is committed to preventing modern slavery and human trafficking in all its forms within our business and supply chains. This statement is made in accordance with the UK Modern Slavery Act 2015 (and/or applicable jurisdictional law) and outlines the steps we have taken to address and mitigate the risk of modern slavery.

**Our Commitment**

Modern slavery, including slavery, servitude, forced labour, and human trafficking, is a violation of fundamental human rights. Espria, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all business relationships and implementing effective systems and controls to prevent any form of modern slavery.

**Scope**

This policy applies to all employees, contractors, suppliers, and business partners working with Espria. We expect all individuals and entities within our operations and supply chain to uphold the same values.

**Organisational Structure and Supply Chains**

Espria operates in across multiple business sectors with operations in the United KIngdon. Our supply chains include manufacturing and distribution partners across the IT industry.

We recognise that certain industries, sectors, or regions may have higher risks of modern slavery, and we take a proactive approach to mitigate these risks.

**Policies and Procedures**

To support our commitment to eradicating modern slavery, we have implemented the following policies and procedures:

* **Code of Conduct**: Outlines expectations for ethical behaviour and respect for human rights.
* **Supplier Code of Conduct**: Requires suppliers to adhere to ethical labour practices and comply with applicable laws.
* **Whistleblowing Policy**: Encourages employees and stakeholders to report any concerns, including modern slavery, in confidence without fear of retaliation.
* **Recruitment Policies**: Ensure fair, transparent, and ethical recruitment practices, prohibiting fees for employment or retention of identity documents.

**Due Diligence and Risk Management**

Espria conducts due diligence to identify, assess, and mitigate modern slavery risks in our business and supply chain. This includes:

* Assessing supplier practices to ensure compliance with our standards.
* Monitoring high-risk suppliers and regions.
* Conducting audits and assessments where appropriate.
* Requiring suppliers to complete self-assessments and certifications of compliance.

**Training and Awareness**

We provide training to employees to raise awareness of modern slavery, its risks, and how to identify and report concerns. Additional training is provided to key personnel involved in procurement, supply chain management, and human resources.

**Measuring Effectiveness**

To assess the effectiveness of our measures to prevent modern slavery, Espria will:

* Regularly review and update policies and procedures.
* Track and investigate any reports or incidents of modern slavery.
* Evaluate supplier compliance through audits and self-assessments.
* Set key performance indicators (KPIs) to monitor progress.

**Reporting Concerns**

All employees, suppliers, and stakeholders are encouraged to report any concerns related to modern slavery or human trafficking. Concerns can be raised through our Whistleblowing process or by contacting the Head of Compliance directly.

**Approval and Review**

This statement has been approved by the Board of Directors of Espria and will be reviewed annually to ensure ongoing effectiveness.

Clinton Groome

CEO January 2025