



POLICY

Modern Slavery

Updated: August 2025

Version: 1.2

Change Record:

Version	Date	Author	Description of Changes
1.0	1/8/2024	Laura Carey	Initial Release
1.1	2/1/2025	Tom Higginson	Formatting/Review
1.2	21/08/2025	Dan Ingham	Review/Update

Questions or concerns relating to this policy should be addressed to hr@fsp.co





Introduction

This policy outlines FSP Consulting Services Limited's ("FSP") ongoing commitment to identifying and mitigating any potential risks of modern slavery within its operations and supply chains. FSP is committed to preventing modern slavery and human trafficking across all aspects of its business.

Business Operations

FSP is a consultancy delivering digital transformation and technology services to a wide range of clients. We are committed to conducting all aspects of our business with the highest standards of integrity and ethical responsibility. We recognise our duty to uphold human rights and to take proactive steps to prevent any form of modern slavery, forced labour, or exploitation within our operations, supply chains, and client relationships. FSP operates primarily in the UK, with satellite offices in Barcelona and India, and we apply the same rigorous standards across all locations.

High Risk Activities

None of FSP's activities have been identified as carrying a high risk of human slavery or trafficking.

Responsibility for Anti-Slavery Measures:

- **Policies:** Our HR department is responsible for reviewing and developing all policies related to our workforce, ensuring alignment with our commitment to preventing slavery and human trafficking.
- **Investigations:** There have been no known instances of slavery or human trafficking within our operations since FSP was incorporated.
- **Training:** Every staff member participates in an induction course upon joining the organisation and regularly attends company updates. All employees are fully informed of their duty to report any suspicions of slavery or human trafficking immediately. We reserve the right to disengage from any client suspected of involvement in such activities.





Relevant Policies

- **Recruitment:** All new employees are required to provide proof of identification and right to work in the UK or the country of employment. This involves physical checks of employee's passports or birth certificates. In addition, we contact two referees. This also applies to contractors.

Training

FSP will continue to train all staff to be vigilant and alert to the possibility of modern slavery. However, it is recognised that FSP is not operating in any of the high-risk areas such as: construction, manufacturing, agriculture and fishing – or in high-risk countries.

Policies

Although FSP are in a very low risk industry, we encourage our staff to be vigilant should they be on customer sites in industries or countries where slavery or human trafficking may exist. We do this by adhering to the following procedures:

- we would not engage labour at a rate below the minimum wage
- we would act quickly to inform the relevant authorities, should we suspect an instance of slavery or trafficking
- we would escalate the issue to the relevant parties within the organisation concerned
- we would ensure, as far as possible, that our clients and suppliers have implemented their own anti-slavery policies
- if we are convinced that a supplier or client was involved in such activities, we would cease to engage with them on a commercial basis

ILO Compliance

FSP is dedicated to upholding the standards set by the International Labour Organisation (ILO) to ensure fair and ethical employment practices. We are committed to embedding these standards within our operations and supply chains in the following ways:





Elimination of Forced or Compulsory Labour:

FSP strictly prohibit any form of forced or compulsory labour in our operations and supply chains. This is also covered in ethical supplier policy when onboarding new suppliers.

Abolition of Child Labour:

Recruitment processes are designed to verify the age and eligibility of all employees.

Elimination of Discrimination in Respect of Employment and Occupation: FSP promotes a work environment free from discrimination and ensures equal opportunity for all employees, regardless of race, gender, religion, or nationality.

- Any reports of discrimination are taken seriously and addressed promptly.
- Although we are in a very low-risk industry, we encourage our staff to be vigilant should they be on customer sites in industries or countries where slavery or human trafficking may exist. We do this by adhering to the following procedures:
 - We would not engage labour at a rate below the minimum wage. ○ We would act quickly to inform the relevant authorities, should we suspect an instance of slavery or trafficking.
 - We would escalate the issue to the relevant parties within the organisation concerned.
 - We would ensure, as far as possible, that our clients and suppliers have implemented their own anti-slavery policies.
- If we are convinced that a supplier or client was involved in such activities, we would cease to engage with them on a commercial basis.





Board Approval

The FSP Board of Directors holds the ultimate responsibility for this policy, ensuring that it aligns with our commitment to ethical practices. This policy has been reviewed and approved by the Board, reflecting their dedication to upholding the highest standards of integrity across our organisation.

Signed for and on behalf of FSP Consulting Services Limited:

DocuSigned by:

Daragh Phelan

3F720D513451496...

Daragh Phelan

CFO

Date: 21/08/2025

