



Constellia Limited

Anti-slavery and Human Trafficking Statement

Statement On Anti- Slavery and Anti- Human Trafficking

This statement on Anti - Slavery and Anti - Human Trafficking was approved on **28th February 2024** for Constellia Ltd and subsidiaries (Constellia Public Ltd and Constellia Private Ltd), a company registered in England & Wales, company number 06401989 at 43 Berkeley Square, London, England W1J 5FJ. This statement has been published pursuant to the provisions of Section 54(1) of the UK Modern Slavery Act (2015).

Introduction

At Constellia we are committed to upholding and consistently maintaining responsible business practices to ensure that we are not violating or facilitating any violations of human rights. Pursuant to ensuring the protection of human rights we have adopted a zero-tolerance approach to all forms of slavery and human trafficking in our organisation. By working closely with our clients and suppliers we seek to use our relationship with them to positively influence risk assessments and provide insight on best practices to eliminate or reduce risk of modern slavery occurring.

Constellia Organisation Structure

Constellia group is made up of the three (3) following private limited companies:

- I. Constellia Limited.
- II. Constellia Private Limited.
- III. Constellia Public Limited.

Constellia provides consultancy and procurement services to clients based in the United Kingdom in the private and public sector. We work with our suppliers who provide us with the goods and services we need (i) to operate our business; and (ii) to support to our clients and meet our obligations to them. Given that our business provides professional services to clients in the United Kingdom we assessed and came to conclusion that the risk of modern slavery in our operations is low. However, with regard to the categories that we manage as part of our services we came to the conclusion that some categories may present an elevated risk e.g. facilities management and construction. To manage this risk and ensure that we remain committed to the principles of accountability and transparency, Constellia will review supplier responses to the Modern Slavery Due Diligence form (from time to time) to ensure that we are continually improving our practice while minimising the risk of slavery or other human rights violations occurring.

Our Supply Chain

We expect our suppliers to be as committed as we are to anti-slavery and to upholding human rights. However, we recognise that there is a possibility of modern slavery occurring in our supplier's supply chain, especially for those operating in high-risk jurisdictions. Therefore, to ensure that we continue uphold our commitment to human rights and anti-slavery we will do the following:

- we will seek to impose contractual obligations on suppliers related to compliance with relevant laws including but not limited to modern slavery and where applicable ensure those obligations will apply to any subcontractor(s).
- require new suppliers to provide us with relevant information as part of the due diligence process to determine the risks of entering into a business relationship with them.
- require our suppliers to provide information on what policies they have in place to address modern slavery risks in their business and supply chains.

Risk Assessment and Due Diligence Process

We seek to be a positive influence on our Clients through constant interaction and discussion regarding their needs to enable us to positively influence the client's risk assessment and provide insight on best practices to eliminate or reduce risk of Modern Slavery. We are committed to maintaining a shared sense of responsibility for our commitment to human rights including but not limited to anti-slavery and anti-human trafficking. To that end Constellia is taking action by continually reviewing and updating relevant internal policy to minimise the risk of human rights violations in our business. As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures as part of our risk assessment:

- supplier reviews e.g. operating jurisdiction and services provided (reviewed by Constellia and certified by the Supplier on an annual basis).
- supplier responses to Constellia's Modern Slavery due diligence form (reviewed by Constellia and certified by the supplier on an annual basis).

Our due diligence procedures aim to:

- Identify and act on potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

However, it is important to note that Constellia are not in a position to assess or comment on the risk of violations by all of our clients and suppliers. To that end, we seek to minimise risk by specifically targeting client and suppliers that are working on matters considered high risk. We will select an appropriate number of suppliers and clients operating in such high-risk areas and conduct another review to ensure continued compliance. The selection process will take into account following factors:

- the perceived risk of human rights violations occurring;
- the size and scale of supplier and;
- the scale of the project.

Please note the factors listed above are not exhaustive but are meant to be illustrative of some of the factors considered.

Policies in relation to slavery and human trafficking:

Our internal policies demonstrate our commitment to doing business responsibly by aligning our operations with the law and best industry practice for ensuring the protection of human rights, labour rights and anti-corruption. We have internal policies and procedures that demonstrate our commitment to minimising the risk of modern slavery in our business and supply chain. These include but not limited to the following policies:

- Modern Slavery due diligence
- Anti-Corruption
- Anti-Bribery
- Internal supplier review
- Equality and diversity
- Whistleblowing

For a full list of our relevant policies please contact us at info@constellia.com

Our policies are designed to encourage our personnel to report and highlight suspected and/or actual wrongdoing as soon as possible. To further assist them with this objective, Constellia shall from time to time provide training to ensure that personnel have the knowledge they need to accurately identify actual and/or suspected wrongdoing. To ensure that our personnel feel that they can voice their concerns without repercussions we have in place a robust whistleblower policy. This policy requires Constellia to take the concerns raised by staff seriously and promptly investigate them while ensuring the protection of whistleblower's confidentiality and anonymity. These policies are made easily accessible to all our employees and suppliers.

Training on Modern Slavery and Human trafficking

As of January 2024, Constellia provided mandatory in-depth training to staff virtually. The training was based on guidance and training published by the UK Border Force and the Home Office. The training was created with the intended goal of enabling staff to (i) recognise actual or suspected modern slavery; and (ii) equip staff with the necessary knowledge needed to empower them to take action against modern slavery. In addition, to the training on Modern Slavery and Human Trafficking staff were required to complete training on whistleblowing. The intended goal of the training was to ensure that staff feel safe and encouraged to report any suspected and/or actual wrongdoing, especially in relation to any suspected wrongdoing related to human rights, labour rights and anti-corruption.

Key performance indicators (KPI)

Constellia is in the process of developing Key Performance Indicators (KPIs) to better understand the effectiveness of our approach to managing the risk associated modern slavery. These KPIs will cover responses from suppliers and Clients to ensure that our risk assessments remain as accurate and as comprehensive as reasonably possible.

Constellia recognises that our reviews and assessments of suppliers and client to identify and address modern slavery risks across our operations and supply chain will be an ongoing and evolving process. To that end, Constellia has identified KPIs as an area for improvement and will continue to develop its own KPIs over the course of 2024 to ensure Constellia is adequately monitoring and reviewing the risk of violations to human rights and labour rights.

Key progress

As of November 2023, Constellia met the statutory requirement for publishing this modern slavery statement. As we continue to grow, we will:

- maintain our commitment train our personnel and continually review our policies to ensure they remain fit for purpose.
- Review and update agreements with anti-slavery clauses to ensure that our suppliers are contractually bound to ensure compliance with the Modern Slavery Act 2015.
- Develop adequate KPIs over the course of 2024 to support with monitoring compliance with the Modern Slavery Act 2015. These KPIs will not only cover Constellia and its personnel e.g. tracking staff who have completed any mandatory training related to human rights, labour rights and anti-corruption but also to Suppliers e.g. percentage of suppliers who completed and passed the Modern Slavery due diligence. The review and implementation of KPIs will be an ongoing process throughout 2024.

Next Steps

To continue upholding our commitment we have established the following priorities for the rest of 2023 and beyond:

- Continue with additional training for employees who are involved in managing our supplier relationships to enable them to recognise risk factors more easily.
- Continue to develop policies and procedures relating to the protection of human rights, labour rights, the environment and anti-corruption.
- Complete and publish our response to the Modern Slavery Assessment Tool (MSAT).
- Continue reviewing and updating our due diligence process.

This statement on Anti - Slavery and Anti - Human Trafficking is published pursuant to section 54(1) of the Modern Slavery Act 2015. Approved by the Chief Executive Officer of Constellia Limited on **28th February 2024**.

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Rob Levene

CEO of Constellia Limited