

CreateFuture

Modern Slavery & Human Trafficking Statement

xSolutions365 t/a CreateFuture

2024 / 2025



CreateFuture

Introduction

CreateFuture is on an action-driven mission: to create tomorrow, together, today. Part of that aligns with our value of caring deeply about our colleagues, clients and their customers, seeking to make CreateFuture both an organisation that people want to work for and win.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Our Commitment

CreateFuture has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to transparency in our efforts to ensure that modern slavery is prevented and eliminated, consistent with obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Applicability

This statement applies to all persons working for CreateFuture or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This statement does not form part of any employee's contract of employment and we may amend it any time.

Responsibility

The CreateFuture Board is responsible for ensuring this statement complies with our legal and ethical obligation, and that all those under its control comply with it.

Divisional Managers and Directors are responsible for ensuring compliance in their divisions and for their supplier relationships. They have primary and day-to-day responsibility for implementing this statement, monitoring its use and effectiveness,

CreateFuture

dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Employees are responsible for ensuring they are familiar with employee policies and guidelines relating to modern slavery and complete any associated compliance training

Structure and supply chains

With 500+ people across five UK locations, we provide the technical expertise, unwavering commitment and straight talking approach that builds better futures for our colleagues, clients and their customers.

Our supply chains include:

- Business and Professional services
- Providers of IT equipment, cloud storage centres, software and services
- Professional services from lawyers, accountants and other advisers
- Office and facilities service management
- Travel and accommodation providers and agents
- Recruitment agencies and suppliers of contractors
- Marketing, PR and production of print and promotional content

Due Diligence

We acknowledge the importance of identifying and addressing modern slavery risks within our supply chain. To take appropriate steps, we:

- Conduct appropriate checks and risk assessments of our suppliers to ensure we are identifying areas of concern related to modern slavery and human trafficking (e.g. carry out appropriate checks on all employees, recruitment agencies and suppliers).
- Assessments of the existing supply chain to consider particular product or geographical risks of modern slavery.
- Hold appropriate audits to verify compliance with our internal set of standards.
- Investigating all claims of unethical behaviour.

We also undertake due diligence in relation to our employment practices, such as:

- Ensuring every employee has a written employment contract, that they are paid in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.
- Having regular policy workshops and training sessions to ensure employees are familiar with policies and guidelines relating to modern slavery and complete any associated compliance training.
- Being aware of CreateFuture's responsibility to report any suspected incidents of modern slavery and human trafficking to the Gangmasters & Labour Abuse Authority.

CreateFuture

- Ensuring employees have access to materials and information about modern slavery and human trafficking.

Risk assessment and management

Due to the nature of our business, we consider ourselves to have a limited number of suppliers and therefore a low risk of modern slavery existing in our business and supply chains. However, we have identified areas to monitor risk:

- Young pupils seeking work experience: Our graduate and internship programmes and how we support young people. To reduce any associated risks we only take on young people as part of outreach programmes connected to organisations. We also limit the period of time and closely monitor the pupils' experience with dedicated mentors and contacts.
- Recruitment and agency workers: We only use specified and reputable employment agencies to source labour and always follow a clear supplier onboarding process. Once onboarded, regular reviews take place.

Key performance indicators to measure effectiveness of steps being taken

As part of our commitment to continuous improvement to mitigate modern slavery, we continuously review and update our policies, conduct regular risk assessments, and ensure we are collaborating with stakeholders.

Thus far, we have no recorded occurrences of modern slavery recorded or uncovered within CreateFuture our supply chains. Quarterly, we internally audit the risk of modern slavery under our governance review and discuss areas of concern.

We also communicate and ensure awareness of modern slavery and human trafficking during every induction process, during our quarterly policy updates and information about modern slavery and human trafficking can be found on our internal portal.

Policies in relation to Modern Slavery Act 2015

CreateFuture has an Anti-Modern Slavery and Human Trafficking Policy which aims to ensure that modern slavery and human trafficking are not taking place in any part of CreateFuture's own business or supply chain. The CreateFuture Anti-Modern Slavery and Human Trafficking policy applies to all individuals working at or for CreateFuture and its subsidiaries at all levels and grades this includes - senior managers, officers, directors, employees, contractors, advisors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents or any other person associated with CreateFuture.

Additional related policies outlining steps taking to prevent slavery and human trafficking:

- Whistleblowing Policy
- Grievance Policy
- Equal Opportunity and Diversity Policy

CreateFuture

- DEIB Charter & Code of Conduct
- Recruitment and Selection Policy (containing information on verification, vetting and background checks)

All of our policies are available to all employees via our internal portal, and issued to all new employees as part of their onboarding process. We regularly review our policies to ensure that they are compliant, consistent and effective in promoting good practice.

Training and Awareness

As part of our onboarding and induction, new employees are directed to our portal containing all of the relevant policies above.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us. We put emphasis on ensuring our employees understand the risk of modern slavery and human trafficking and how to raise concerns that they may have.

Reporting of Breaches

If CreateFuture has a reasonable belief that modern slavery is occurring in any part of its business, it will take appropriate measures to ensure that such modern slavery ceases to occur and that the victims are appropriately protected.

If any other individuals/organisations who work on CreateFuture's behalf breach this policy, CreateFuture may terminate or suspend the relationship or otherwise cease, reduce or minimise business contact with the relevant contractor, supplier or other business partners.

The prevention, detection and reporting of modern slavery in any part of CreateFuture's business or supply chains is the responsibility of all those working for CreateFuture or under its control. Furthermore, any activity that might lead to, or suggest, a breach is not permitted.

As per our internal policy, if employees believe or suspect a breach of the policy has occurred in any part of CreateFutures' business or supply chain, or that it may occur, they must notify a manager or report it in accordance with the Whistleblowing Policy as soon as possible.

CreateFuture encourages openness and will support anyone who raises genuine concerns in good faith under our policy, regardless of the outcome. We are committed to ensuring no one suffers any detrimental treatment (including dismissal, disciplinary action, threats or other unfavourable treatment) as a result of reporting in good faith their suspicion that modern slavery of whatever form is, or may be, taking place in any part of CreateFuture or its supply chain. If one believes that they have suffered any such treatment, they should inform a manager or company Director immediately. If the matter is not remedied, it should be raised formally using our Grievance Procedure.

CreateFuture

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps CreateFuture has taken to detect and prevent slavery and human trafficking in its organisation and supply chain for the current financial year.

This statement was approved by our board of directors on 8 August 2024.

Scott Robertson

Scott Robertson

Chief Financial Officer