

## Modern Slavery Act Transparency Statement

### 1. Introduction

This statement is made on behalf of Adarma Limited pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes our business' slavery, child labour and human trafficking statement for the financial year end 30 April 2022 and outlines the steps we have taken to assess our operations and supply chain and mitigate the risks of slavery and human trafficking. This statement was approved by the board of Adarma Limited, and has been approved by our Chief Executive Officer, John Maynard, on 25<sup>th</sup> April 2022.

### 2. Our business and structure

We are a leading IT services provider offering services in Cyber Security and operating in the United Kingdom with over 319 employees across Edinburgh and London.

### 3. Purpose

Our purpose is to protect the promise of cyber resilience whilst building a safer, fairer and more sustainable shared future for our customers and communities across the world, therefore we take adherence to legislation seriously and strive to always act ethically and with integrity.

### 4. Our supply chains

Our supply chain includes cleaning services, couriers, IT hardware and software providers, building and maintenance contractors, IT consultants, recruitment agencies, marketing services, legal and insurance advisers, training providers and criminal and financial screening agents. As a software company, our business model does not carry with it a high level of slavery risk compared to businesses operating in other sectors. Nevertheless, this Statement covers those areas within our business supply chain which we have identified as presenting a potential slavery risk. We continue to focus on these areas to ensure we mitigate any associated risks to a reasonable level.

There were no instances of slavery or human trafficking concerns raised to us during the financial year ending 31 December 2021 and no enhanced risk identified due to the Coronavirus pandemic.

### 5. Taking action

We are committed to ethical trading principles and to acquiring goods and services without harm to others. We consider our supply chain the main area of potential exposure to forced labour, consequently, over the last year we have taken action to mitigate our Modern Slavery exposure in our supply chain. We have implemented a Third-Party Code of Conduct which we encourage all of our suppliers, contractors and partners to sign up to, which (among other things) ensures (i) a commitment to taking adequate steps to eradicate forced labour within their own businesses and supply chains and (ii) an ability for us to terminate the contract without notice where a supplier has failed to take such steps.

We have updated our supplier onboarding questionnaire which poses questions to potential suppliers on their modern slavery record, and what steps they take to mitigate the risk within their own organisation. Where we consider any new supplier to be within a jurisdiction, industry or sector that is high risk in relation to modern slavery, we will carry out additional due diligence on such suppliers.

## **6. Next Steps**

We implemented enhanced assurance for suppliers with higher risk profile and intend to record key performance indicators such as the number of suppliers who agree to comply with our aforementioned Third-Party Code of Conduct. We also intend to implement appropriate training materials for relevant staff involved in the procurement process, to make them aware of the requirements of the Act.

## **7. Our people**

As a destination employer for cyber careers in the UK the recruitment and engagement of staff is of paramount importance to us and we undertake a thorough pre-employment screening process of all staff. This includes obtaining documented proof of the individual's right to work in the UK. We are also a Living Wage Employer.

Our senior leadership team at Adarma Limited are responsible for implementing this Statement, which is reviewed at least annually and made available on our website.

