

Modern Slavery and Human Trafficking Statement

The statement sets out Castlegate IT's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small and staff are expected to report their concerns and for management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Castlegate IT; a digital agency providing design, development, hosting, maintenance, support, and consulting services to business and organisations of all sizes and across a variety of sectors.

Castlegate IT considers its activities to be of low risk in respect of slavery and human trafficking, although through continual review and assessment of current and new service providers, Castlegate IT will identify where there may be any potential for particular risks.

The services Castlegate IT utilises are office-based and its supply chain consists, on the whole, of regulated professional services (IT service providers meeting ISO standards, software developers adhering to best practices, accountancy and insurance firms, and banks). Castlegate IT considers these to be low risk in relation to slavery and human trafficking so takes no specific action in respect to these relationships.

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** the Managing Director is responsible for creating and reviewing policies. The process by which our policies are developed is looking at best practice and adapting to the needs of the business.
- **Risk assessments:** the Managing Director is responsible for maintaining the procedure which covers due diligence checks on suppliers with regards to human rights and modern slavery. This procedure is periodically audited and results reviewed by senior management on an annual basis.
- **Due diligence:** the Managing Director is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Our people

Our direct workforce consists of professionally qualified and skilled employees and we consider the risk of modern slavery occurring within our business to be low.

All new employees are directed to our employee handbook, which sets out that we expect the highest standards of ethics and integrity and makes clear that we oppose all forms of unfair discrimination or victimisation.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, Castlegate IT will communicate its statement widely, internally and externally, at induction, and publication on the Company's website. In any circumstances where we consider there may be a risk, appropriate training will be developed and targeted at those personnel who may have direct exposure.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business. This statement affirms our intention to act ethically in our business relationships.

Castlegate IT encourages all employees, customers, and other business partners to report any concerns related to its direct activities or its supply chains.

Due diligence processes for slavery and human trafficking

The Company undertakes due diligence when considering taking on new service providers, and regularly reviews its existing service providers.

Performance indicators

Castlegate IT will measure how effective it is in ensuring slavery and human trafficking is not taking place in any part of our business through regular audit review.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Managing Director endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Jim Semlyen

Position: Managing Director

Date: 25 April 2023

