

Modern Slavery Policy

© Contronics Limited 2026

Prepared by



Nigel Horton, Office & Compliance Manager

14/04/2026

Date

Reviewed and approved by



Paul Flood, Quality Manager

14/04/2026

Date

This document is the exclusive property of Contronics Limited and is supplied without liability for errors or omissions. All rights reserved. No part may be disclosed, reproduced, copied, stored, or transmitted by any means without the prior written permission of the Quality Manager.

Contronics Limited
Greenfield Farm Estate
Congleton
Cheshire CW12 4TU

☎ +44 (0) 1260 298383

1 Revision History

Issue	Date	DCN	Author	Details
1	14 th April 2026	2862	Nigel Horton	First Issue

Contents

1	REVISION HISTORY	2
2	TABLE OF CONTENTS.....	3
3	RELATED DOCUMENTS.....	4
4	CONTEXT & SCOPE.....	5
5	RESPONSIBILITIES.....	8
6	DUE DILIGENCE AND RISK ASSESSMENT	10
7	REPORTING & ESCALATION	12
8	TRAINING & AWARENESS.....	14
9	SUPPLIER EXPECTATIONS.....	16
10	EFFECTIVENESS, MONITORING AND CONTINUOUS IMPROVEMENT... 	18
11	POLICY REVIEW, APPROVAL AND GOVERNANCE.....	20
12	CONTRONICS MODERN SLAVERY POLICY STATEMENT	22
13	CONTRONICS SUPPLIER CODE OF CONDUCT	24
14	VESTA SOFTWARE GROUP MODERN SLAVERY STATEMENT	26

3 Related Documents

Quality Policy Manual	9001QM01
Environmental Policy Manual	9001QM02
Environmental, Social & Governance Policy	9001QN188
Vesta Software Group Modern Slavery Statement (Copied within Section 14)	Vesta Software Group
Disciplinary Policy	Vesta Software Group
Equal Opportunities & Dignity at Work Policy	Vesta Software Group
Grievance Policy	Vesta Software Group
Whistleblowing Policy	Vesta Software Group
Anti-Bribery Policy	Vesta Software Group
Anti-Harassment & Anti Bullying Policy	Vesta Software Group
Anti-Facilitation of Tax Evasion Policy	Vesta Software Group

4 Context & Scope

4.1 Scope

This policy applies to **Contronics Limited**, including all employees, directors, agency workers, contractors, and any third parties acting on behalf of the organisation. The policy covers **all business activities undertaken by Contronics**, with particular emphasis on:

- The **procurement of goods and services**, including equipment, components, consumables, subcontracted services and logistics
- **Supply chain relationships**, both direct and indirect, within the UK and internationally
- Activities connected with the **delivery of goods or services to NHS bodies, public sector organisations, and other customers** where modern slavery risk may arise

This policy is designed to support compliance with:

- **Procurement Policy Note (PPN) 009 – Tackling Modern Slavery in Government Supply Chains**, as applicable to suppliers to central government and NHS bodies
- The **Modern Slavery Act 2015**, including the principles of transparency in supply chains
- The **National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2024**, where Contronics supplies goods or services for the purposes of the health service in England

Ownership:

Contronics Limited is required to maintain a Modern Slavery Statement because of its **ownership within the Vesta Software Group**, and its participation in group-wide governance, risk and compliance arrangements.

Group Turnover and Legal Thresholds

Under section 54 of the **Modern Slavery Act 2015**, organisations are required to publish a Modern Slavery Statement where they:

- Carry on a business, or part of a business, in the UK; and
- Have a **global annual turnover exceeding £36 million**, including the turnover of subsidiary undertakings

As a subsidiary within the **Vesta Software Group**, Contronics forms part of a wider corporate group whose consolidated turnover exceeds this statutory threshold. As a result, Contronics is expected to align with **group-level modern slavery governance and transparency obligations**, even where its standalone turnover may fall below the threshold.

In so doing, certain policies, systems and processes will originate from the company internally (Contronics QMS) or externally by Vesta Software Group.

4.2 Application Across the Commercial Lifecycle

In line with PPN 009 and NHS requirements, this policy applies across the **entire commercial and contract lifecycle**, including:

- Pre-procurement and supplier selection activities
- Contract award and onboarding of suppliers
- Contract delivery, performance monitoring and contract management
- Renewal, extension or termination of contracts

Contronics recognises that **modern slavery risk can exist at any stage** of the supply chain and commits to taking a **risk-based and proportionate approach** to identifying, assessing and mitigating those risks.

4.3 Supply Chain Coverage

This policy applies to:

- **Tier 1 suppliers** (direct suppliers to Contronics)
- **Subcontractors and service providers** used in the delivery of customer contracts
- Where reasonably practicable, **lower-tier suppliers** where there is an increased risk of modern slavery due to:
 - Country of origin
 - Sector or commodity risk
 - Nature of the labour involved

Contronics expects its suppliers to apply equivalent standards within their own supply chains and to cooperate with reasonable due diligence or assurance activities.

4.4 NHS Specific Context

Where Contronics supplies goods or services **for the purposes of the health service in England**, this policy supports the requirements of the **NHS (Procurement, Slavery and Human Trafficking) Regulations 2024**, including:

- Assessing modern slavery risk in relevant supply chains
- Taking **reasonable and proportionate steps** to mitigate identified risks
- Supporting NHS customers with information, assurances, or evidence required to meet their statutory duties

Contronics acknowledges that these requirements apply **regardless of contract value** and throughout the duration of the contract.

4.5 Exclusions & Proportionality

This policy is applied proportionately, recognising:

- The size and nature of Contronics as an organisation
- The scale, complexity and risk profile of individual contracts and supply chains

Low-risk activities may require minimal controls, while higher-risk areas will be subject to enhanced due diligence and monitoring, consistent with PPN 009 guidance.

4.6 Compliance Risk Assessment

Risk level: Low 

This scope is consistent with current UK public sector and NHS modern slavery requirements and is suitable for inclusion in tenders, audits, and supplier assurance packs.

5 Responsibilities

5.1 Board of Directors / Senior Management

Senior Management has overall responsibility for ensuring that Contronics:

- Takes a **zero-tolerance approach to modern slavery and human trafficking**
- Complies with all applicable legislation, policy and guidance relating to modern slavery, including PPN 009 and NHS requirements
- Provides appropriate oversight, resources and leadership to support the effective implementation of this policy
- Ensures that modern slavery risks are considered as part of **strategic decision-making and risk management**

5.2 Compliance and Quality Management

The Compliance and Quality function is responsible for:

- Maintaining and reviewing this policy to ensure continued alignment with:
 - **PPN 009: Tackling Modern Slavery in Government Supply Chains**
 - **NHS (Procurement, Slavery and Human Trafficking) Regulations 2024**
- Providing advice and guidance to staff on modern slavery risks and controls
- Supporting due diligence, audits, and information requests from NHS bodies or other public sector customers
- Ensuring relevant records and evidence are retained to demonstrate compliance
- Escalating identified or suspected modern slavery risks to Senior Management

5.3 Procurement and Supply Chain Management

Employees involved in procurement and supplier management are responsible for:

- Applying a **risk-based approach** to identifying modern slavery risks in goods and services
- Conducting proportionate supplier due diligence where appropriate
- Ensuring suppliers are aware of Contronics' expectations regarding ethical labour practices
- Promptly reporting concerns or indicators of modern slavery within the supply chain
- Cooperating with customer or NHS requests for modern slavery-related assurances or information

5.4 Contract and Project Management

Employees responsible for contract delivery and management must:

- Remain alert to potential modern slavery risks during the **lifecycle of contracts**
- Ensure contractual obligations relating to ethical sourcing and labour standards are understood and followed
- Report any concerns identified during contract delivery to Compliance or Senior Management
- Support reasonable monitoring or review activities where modern slavery risk has been identified

5.5 Employees & Workers

All employees, agency staff and contractors working for or on behalf of Contronics are responsible for:

- Acting in accordance with this policy and Contronics' values
- Completing any relevant awareness or compliance training provided
- Being vigilant to signs of modern slavery or human trafficking
- Reporting concerns in good faith, without fear of retaliation, through appropriate internal reporting channels

5.6 Suppliers and Business Partners

Contronics expects all suppliers, subcontractors and business partners to:

- Comply with applicable modern slavery and human trafficking laws
- Maintain appropriate policies and controls within their own operations and supply chains
- Cooperate with reasonable requests for information, assurance or corrective action
- Notify Contronics promptly if they become aware of any actual or suspected modern slavery within their operations or supply chains

Failure to meet these expectations may result in corrective action, up to and including termination of the business relationship.

5.7 Compliance Risk Assessment

Risk level: Low 

This Responsibilities section aligns with current public sector and NHS expectations and is suitable for audits, tenders, and supplier assurance submissions.

6 Due Diligence and Risk Assessment

6.1 Risk-Based Approach

Contronics adopts a **risk-based and proportionate approach** to modern slavery due diligence, recognising that the risk of modern slavery varies depending on:

- The nature of the goods or services supplied
- The sector and geographic location of the supply chain
- The type of labour involved
- The level of control or influence Contronics has over suppliers

Contronics acknowledges that there is **no such thing as “no risk”** of modern slavery and commits to taking reasonable steps, proportionate to the level of risk identified.

6.2 Modern Slavery Risk Assessment

Contronics will undertake modern slavery risk assessments where appropriate, including:

- When onboarding new suppliers
- When entering new or materially changed contracts
- Where supplying goods or services for the purposes of the NHS or public sector
- Where concerns or indicators of modern slavery are identified

Risk assessments may consider, but are not limited to:

- Country risk (including prevalence of forced labour or human trafficking)
- Sector or commodity risk
- Use of low-skilled, temporary or agency labour
- Length and complexity of supply chains
- Supplier transparency and governance arrangements

Suppliers and activities may be categorised as **low, medium or high risk** to inform the level of due diligence required.

6.3 Supplier Due Diligence

Contronics undertakes proportionate supplier due diligence, which may include:

- Requesting confirmation of compliance with applicable modern slavery legislation
- Reviewing supplier policies or statements relating to modern slavery and ethical labour practices
- Including modern slavery-related clauses or expectations within contracts or purchase terms
- Seeking assurances or additional information where higher risks are identified

For higher-risk suppliers or contracts, enhanced due diligence may be applied, such as:

- Targeted questionnaires or declarations
- Requests for evidence of controls or corrective actions
- Increased monitoring during contract delivery

6.4 Ongoing Monitoring and Review

Modern slavery risk is not treated as a one-off assessment. Contronics commits to:

- Monitoring supplier performance throughout the contract lifecycle
- Reassessing risk where there are changes to suppliers, locations, scope or labour practices
- Responding promptly to new information, concerns or customer requests

Where modern slavery risk increases, Contronics will review and adjust its controls accordingly.

6.5 Managing Identified Risks

Where actual or potential modern slavery risks are identified, Contronics will take **reasonable and proportionate steps** to address them, which may include:

- Engaging with the supplier to seek clarification or improvement
- Agreeing corrective action plans with appropriate timescales
- Increasing oversight or monitoring
- Escalating concerns to Senior Management
- Suspending or terminating the business relationship where risks cannot be adequately mitigated

6.6 Record Keeping and Evidence

Contronics maintains appropriate records to demonstrate compliance with this policy, which may include:

- Risk assessments
- Supplier declarations or assurances
- Correspondence relating to identified risks or mitigation actions

Records are retained in accordance with internal document control and quality management procedures and may be made available to NHS bodies or public sector customers upon reasonable request.

6.7 Compliance Risk Assessment

Risk level: Low 

This Due Diligence and Risk Assessment section aligns with **PPN 009** and **NHS modern slavery regulatory expectations**, and is suitable for audits, tenders, and contract assurance.

7 Reporting & Escalation

7.1 Reporting Concerns

Contronics is committed to ensuring that any concerns relating to modern slavery or human trafficking are **reported promptly and taken seriously**.

All employees, workers, contractors and third parties acting on behalf of Contronics are encouraged to report, in good faith, any concerns or suspicions relating to:

- Actual or suspected modern slavery or human trafficking
- Unethical or exploitative labour practices
- Breaches of this policy or supplier commitments

Concerns may arise within Contronics' own operations or at any level of the supply chain.

7.2 How to Report

Concerns should be reported through one of the following channels:

- Line Manager
- Compliance or Quality Management
- Senior Management

Where appropriate, concerns may also be raised using Contronics' whistleblowing arrangements.

Reports may be made verbally or in writing and should include as much relevant detail as possible to support appropriate investigation.

7.3 Confidentiality and Protection

Contronics will:

- Treat all reports sensitively and, where possible, confidentially
- Protect individuals who raise concerns in good faith from retaliation, victimisation or adverse treatment
- Handle reports in line with applicable whistleblowing and employment protections

Malicious or deliberately false reporting may be treated as a disciplinary matter.

7.4 Escalation and Investigation

All reported concerns relating to modern slavery will be:

- Logged and assessed by Compliance or Senior Management
- Escalated appropriately based on the severity and credibility of the concern
- Investigated in a proportionate and timely manner

Where necessary, Contronics may engage with:

- Suppliers or subcontractors
- Customers or contracting authorities (including NHS bodies)
- Relevant external organisations or authorities, where legally required

7.5 Response and Corrective Action

Where a concern is substantiated, Contronics will take **reasonable and proportionate action**, which may include:

- Requiring suppliers to implement corrective actions
- Increasing monitoring or oversight
- Suspending or terminating supplier relationships
- Reviewing internal controls or procedures to prevent recurrence

Contronics recognises that remediation and prevention are key components of effective modern slavery risk management.

7.6 Record Keeping

Appropriate records will be maintained of:

- Reported concerns
- Actions taken
- Outcomes and corrective measures

Records will be retained in accordance with Contronics' document control and quality management procedures and may be made available to NHS bodies or public sector customers upon reasonable request.

7.7 Compliance Risk Assessment

Risk level: Low 

This Reporting and Escalation section meets current **PPN 009** and **NHS modern slavery regulatory expectations** and is suitable for audits, tenders and supplier assurance processes.

8 Training & Awareness

8.1 Commitment to Awareness

Contronics recognises that **training and awareness are essential** to the effective identification, prevention and management of modern slavery and human trafficking risks.

The organisation is committed to ensuring that relevant employees understand:

- What modern slavery and human trafficking are
- How modern slavery risks may arise within supply chains
- Their responsibilities under this policy
- How to recognise and report concerns

8.2 Training Provision

Contronics will provide **appropriate and proportionate training** to employees based on their role and level of exposure to modern slavery risk.

Training may include:

- Induction awareness for new employees
- Targeted training for staff involved in:
 - Procurement and supplier management
 - Contract and project management
 - Compliance and quality management
- Refresher training where policies, risks or regulatory requirements change

Training may be delivered through a combination of briefings, guidance documents, toolbox talks, or online learning, depending on business need.

8.3 Content of Training

Training and awareness activities may cover:

- Definitions and examples of modern slavery and human trafficking
- Key legislation and guidance, including:
 - The Modern Slavery Act 2015
 - PPN 009: Tackling Modern Slavery in Government Supply Chains
 - NHS modern slavery procurement requirements
- Common risk indicators and warning signs
- Reporting and escalation procedures
- The importance of ethical supply chain management

8.4 Supplier and Partner Awareness

Where appropriate, Contronics will:

- Communicate its expectations regarding modern slavery to suppliers and subcontractors
- Reference this policy or equivalent requirements within contractual or onboarding documentation
- Promote awareness of ethical labour practices within the supply chain

This supports a consistent and collaborative approach to managing modern slavery risk.

8.5 Monitoring Effectiveness

Contronics will periodically review the effectiveness of its training and awareness activities by:

- Considering feedback from employees
- Reviewing reported concerns or incidents
- Assessing whether training remains appropriate to identified risk levels

Training arrangements will be updated where necessary to reflect changes in legislation, guidance or business activities.

8.6 Compliance Risk Assessment

Risk level: Low 

This Training and Awareness section aligns with **PPN 009** and **NHS modern slavery regulatory expectations** and is suitable for audits, tenders and supplier assurance processes.

9 Supplier Expectations

9.1 General Expectations

Contronics expects all suppliers, subcontractors and business partners to operate in a manner that respects **human rights, ethical labour practices, and applicable modern slavery legislation**.

Suppliers must take appropriate steps to ensure that **modern slavery, forced labour, human trafficking, servitude and exploitation** do not occur within their operations or supply chains.

9.2 Legal and Policy Compliance

Suppliers are expected to:

- Comply with all applicable laws and regulations relating to modern slavery and human trafficking, including the **Modern Slavery Act 2015**
- Support Contronics in meeting its obligations under:
 - **PPN 009: Tackling Modern Slavery in Government Supply Chains**
 - **NHS (Procurement, Slavery and Human Trafficking) Regulations 2024**, where applicable
- Maintain appropriate internal policies, procedures or controls proportionate to their size and risk profile

9.3 Supply Chain Transparency and Due Diligence

Suppliers must:

- Take reasonable steps to identify and manage modern slavery risks within their own supply chains
- Be transparent about their sourcing, labour practices and supply chain arrangements where reasonably requested
- Provide accurate and timely information, assurances or declarations relating to modern slavery risk when requested by Contronics or its customers (including NHS bodies)

9.4 Labour Standards

Suppliers are expected to uphold fair and ethical labour standards, including:

- Prohibiting forced, bonded or involuntary labour
- Ensuring workers are free to leave employment in accordance with applicable law
- Prohibiting child labour
- Providing working conditions that meet applicable health, safety and employment laws
- Ensuring workers are treated with dignity and respect

9.5 Reporting and Cooperation

Suppliers must:

- Promptly notify Contronics if they become aware of any **actual or suspected modern slavery or human trafficking** within their operations or supply chains
- Cooperate fully with reasonable investigations, audits or information requests relating to modern slavery
- Implement corrective actions where issues are identified and work constructively to mitigate risks

9.6 Subcontracting

Where suppliers engage subcontractors, they are expected to:

- Apply equivalent modern slavery expectations to those subcontractors
- Take reasonable steps to ensure subcontractors comply with applicable legal and ethical standards
- Remain responsible for the actions and practices of subcontractors engaged in delivering goods or services to Contronics

9.7 Non-compliance

Failure to meet these expectations may result in:

- Requests for corrective action
- Increased monitoring or oversight
- Suspension or termination of the business relationship

Contronics reserves the right to take appropriate action where modern slavery risks cannot be adequately addressed.

9.8 Compliance Risk Assessment

Risk level: Low 

This Supplier Expectations section aligns with **PPN 009** and **NHS modern slavery regulatory expectations** and is suitable for inclusion in policies, contracts, supplier onboarding and tender submissions.

10 Effectiveness, Monitoring and Continuous Improvement

10.1 Commitment to Effectiveness

Contronics is committed to ensuring that this Modern Slavery Policy is **effective in practice**, not solely in principle. The organisation recognises that managing modern slavery risk is an ongoing process requiring regular review, monitoring and continuous improvement.

10.2 Monitoring Activities

Contronics monitors the effectiveness of its approach to modern slavery through proportionate and risk-based activities, which may include:

- Reviewing supplier due diligence outcomes and risk assessments
- Monitoring reported concerns, incidents or near-misses
- Reviewing supplier performance and compliance during contract delivery
- Responding to audit findings, customer feedback or assurance requests
- Assessing compliance with contractual and policy commitments

Monitoring activities are scaled according to the level of modern slavery risk associated with the activity or supply chain.

10.3 Key Indicators

Where appropriate, Contronics may use qualitative or quantitative indicators to assess effectiveness, such as:

- Completion of relevant training and awareness activities
- Number and nature of reported concerns or escalations
- Supplier engagement and cooperation with due diligence activities
- Implementation and closure of corrective actions

These indicators are reviewed to identify trends, gaps or areas for improvement.

10.4 Management Review and Escalation

Modern slavery risk and policy effectiveness may be reviewed as part of:

- Management review processes
- Compliance or quality reviews
- Risk management discussions

Significant issues, emerging risks or repeated non-compliance will be escalated to Senior Management for consideration and action.

10.5 Continual Improvement

Contronics is committed to continual improvement and will:

- Update controls and procedures where monitoring identifies weaknesses
- Strengthen supplier engagement where risk profiles change
- Incorporate relevant updates to legislation, guidance or customer expectations
- Learn from incidents, audits and assurance activities

Improvements will be implemented proportionately and in line with the organisation's size, resources and risk exposure.

10.6 Record Keeping

Records relating to monitoring and effectiveness activities may include:

- Management review outputs
- Audit findings and corrective actions
- Supplier communications and assurance evidence

Records are retained in accordance with Contronics' document control and quality management procedures and may be made available to NHS bodies or public sector customers upon reasonable request.

10.7 Compliance Risk Assessment

Risk level: Low 

This Effectiveness and Monitoring section aligns with **PPN 009** and **NHS modern slavery regulatory expectations** and demonstrates active oversight and continuous improvement

11.1 Governance and Ownership

Overall ownership of this Modern Slavery Policy sits with **Senior Management**, with day-to-day responsibility for administration, monitoring and review delegated to the **Compliance and Quality function**.

Governance arrangements ensure that modern slavery risks are:

- Appropriately overseen
- Integrated into relevant compliance and risk management processes
- Escalated where necessary to senior decision-makers

11.2 Policy Approval

This policy is formally approved by **Senior Management** and applies across Contronics Limited.

Approval confirms that:

- The policy reflects Contronics' commitment to ethical business practices
- Appropriate resources and controls are in place to support its implementation
- Responsibilities and expectations are clearly defined

11.3 Review Cycle

This policy will be:

- Reviewed **at least annually**, and
- Updated sooner where required due to:
 - Changes in legislation or regulatory guidance
 - Updates to PPN 009 or NHS modern slavery requirements
 - Significant changes to Contronics' business activities or supply chains
 - Lessons learned from incidents, audits or assurance activities

Reviews will assess the continued suitability, adequacy and effectiveness of the policy.

11.4 Integration with Management Systems

Where applicable, this policy is aligned with and supported by Contronics' wider management systems (QMS, ESG) and procedures, including those relating to:

- Quality and compliance management
- Risk assessment and internal audit
- Supplier management and procurement
- Whistleblowing and ethical reporting
-

This integrated approach supports consistent and effective control of modern slavery risks.

11.5 Communication and Accessibility

The current version of this policy will be:

- Communicated to relevant employees
- Made available internally via company document control arrangements
- Provided to customers, suppliers or other stakeholders upon reasonable request

Suppliers may also be required to acknowledge awareness of, or alignment with, this policy as part of onboarding or contractual arrangements.

11.6 Version Control and Records

All versions of this policy are subject to document control, including:

- Version number
- Approval date
- Review date
- Authorising authority

Superseded versions are retained in line with Contronics' document retention procedures.

11.7 Compliance Risk Assessment

Risk level: Low 

This Policy Review, Approval and Governance section meets **PPN 009** and **NHS modern slavery regulatory expectations** and demonstrates clear oversight, accountability and continuous governance.

12 Contronics Modern Slavery Policy Statement

Contronics Limited is committed to preventing modern slavery and human trafficking in its business operations and supply chains.

We recognise that modern slavery is a serious crime and a violation of fundamental human rights. Contronics operates a **zero-tolerance approach** to slavery, servitude, forced or compulsory labour and human trafficking, and is committed to acting ethically and with integrity in all business relationships.

Our Business and Supply Chains

Contronics Limited supplies goods and services to customers across the public and private sectors, including NHS and other public sector bodies. Our supply chains include UK-based and international suppliers of goods, components and services. We recognise that modern slavery risk varies depending on sector, geography and the nature of labour involved.

Policies and Governance

Contronics has implemented a **Modern Slavery Policy** which sets out our approach to identifying, assessing and managing modern slavery risk. The policy is supported by clear governance arrangements, defined responsibilities, and senior management oversight.

Due Diligence and Risk Management

We adopt a **risk-based and proportionate approach** to due diligence, consistent with **PPN 009** and NHS procurement requirements. This includes:

- Assessing modern slavery risk where appropriate when onboarding suppliers or entering new contracts
- Applying proportionate supplier due diligence and seeking assurances where risk is identified
- Monitoring risks throughout the contract lifecycle and taking reasonable steps to mitigate identified risks

Reporting and Training

Contronics encourages the reporting of concerns and has arrangements in place to ensure concerns can be raised safely and investigated appropriately. Relevant employees receive awareness and role-appropriate training to support the identification and reporting of modern slavery risks.

Continual Improvement

We are committed to continually improving our approach by monitoring effectiveness, reviewing risks, and updating controls where necessary to reflect changes in legislation, guidance or business activities.

Statement on Compliance with the Dhaka Principles

Contronics Limited supports the **Dhaka Principles for Migration with Dignity**, which promote responsible and ethical recruitment and employment practices for migrant workers. While Contronics does not routinely engage migrant labour directly, we are committed to applying the principles proportionately within our operations and supply chains.

In line with the Dhaka Principles, Contronics expects that:

- **All workers are treated fairly and without discrimination**, regardless of nationality or migration status
- **Employment is freely chosen**, with no forced, bonded or compulsory labour
- **No recruitment fees are charged to workers**, and recruitment costs are borne by employers where applicable
- **Contracts are clear, transparent and understood**, with terms and conditions explained prior to employment
- **Workers retain control of their identity documents**, including passports and permits
- **Wages are paid regularly, directly and on time**, in accordance with applicable law
- **Working and living conditions are safe and decent**, with appropriate health and safety protections
- **Freedom of movement and the right to change employment are respected**, in line with legal requirements
- **Freedom of Association**
- **Access to grievance and remedy mechanisms is available**, without fear of retaliation
- **Prohibits** any threat of violence, harassment and intimidation; compulsory overtime; child labour; discrimination

Contronics incorporates these principles into its **supplier expectations, due diligence and risk-based approach** to modern slavery and human trafficking, consistent with **PPN 009** and **NHS modern slavery regulatory requirements**.

This statement is made pursuant to the principles of the **Modern Slavery Act 2015** and supports compliance with **PPN 009** and the **NHS (Procurement, Slavery and Human Trafficking) Regulations 2024**, where applicable.



14th April 2026

Paul Flood, General Manager

Date

13 Contronics Supplier Code of Conduct

(Modern Slavery, Ethical Labour and Responsible Business)

1. Purpose

This Supplier Code of Conduct sets out the **minimum standards** that Contronics Limited expects from its suppliers, subcontractors and business partners (“Suppliers”). Suppliers must conduct their business ethically, lawfully and with respect for human rights, and must take appropriate steps to prevent **modern slavery, human trafficking and labour exploitation** within their operations and supply chains.

2. Compliance with Laws and Standards

Suppliers must:

- Comply with all applicable laws and regulations, including but not limited to:
 - The **Modern Slavery Act 2015**
 - Applicable employment, labour, health and safety, and human rights legislation
- Support Contronics in meeting its obligations under:
 - **PPN 009: Tackling Modern Slavery in Government Supply Chains**
 - **NHS (Procurement, Slavery and Human Trafficking) Regulations 2024**, where applicable
- Maintain policies, procedures or controls proportionate to their size, sector and risk profile

3. Prohibition of Modern Slavery

Suppliers must not engage in, support or tolerate any form of:

- Forced, bonded or compulsory labour
- Human trafficking or servitude
- Child labour
- Withholding of identity documents
- Debt bondage or unlawful recruitment fees

All work must be **voluntary**, and workers must be free to leave employment in accordance with applicable law.

4. Fair and Ethical Labour Practices

Suppliers must ensure that:

- Workers are treated with dignity and respect
- Working hours, wages and benefits comply with applicable laws
- Health and safety risks are managed appropriately
- Disciplinary practices are fair and lawful
- There is no discrimination, harassment or abuse

5. Supply Chain Due Diligence

Suppliers are expected to:

- Take reasonable steps to identify and manage modern slavery risks within their own supply chains
 - Apply equivalent expectations to subcontractors and lower-tier suppliers where appropriate
 - Be transparent about sourcing and labour practices when reasonably requested
 - Provide accurate and timely information, assurances or declarations relating to modern slavery risk
-

6. Subcontracting

Where Suppliers engage subcontractors or third parties in the delivery of goods or services to Contronics, they must:

- Ensure subcontractors comply with this Code or equivalent standards
 - Remain responsible for the actions and practices of those subcontractors
 - Take corrective action where non-compliance is identified
-

7. Reporting and Cooperation

Suppliers must:

- Promptly notify Contronics of any **actual or suspected modern slavery or human trafficking** within their operations or supply chains
 - Cooperate fully with reasonable investigations, audits or information requests
 - Implement corrective actions within agreed timescales where issues are identified
-

8. Monitoring and Audit

Contronics reserves the right to:

- Request reasonable evidence of compliance with this Code
 - Undertake proportionate reviews or audits, directly or through customers (including NHS bodies)
 - Require remedial actions where risks or non-compliance are identified
-

9. Non-Compliance

Failure to comply with this Supplier Code of Conduct may result in:

- Requests for corrective action
- Increased monitoring or oversight
- Suspension or termination of the business relationship

Serious or unresolved breaches may be reported to relevant authorities where legally required.

10. Acknowledgement

Suppliers may be required to confirm their understanding of, and compliance with, this Supplier Code of Conduct as part of onboarding, contract award or ongoing assurance activities.

DocuSign Envelope ID: 582EA1D9-DD72-4F6D-B4E2-12BD43A40AB1



Modern Slavery Statement

Year Ended 31 December 2024

Our businesses and supply chain

Vesta Software Group Limited (Vesta) supplies industry leading enterprise management software and related services to over 10 vertical markets around the world, these include; education, ERP, event technology, healthcare, hospitality, leisure, oil & gas, retail, workforce management and payment processing.

Vesta refers to Jonas Computing (UK) Limited and all of its UK subsidiaries, that are managed under the Vesta brand. Jonas Computing (UK) Limited's immediate parent company is Constellation Software UK Holdco Ltd and its ultimate controlling party is Constellation Software Inc.

Vesta is a collective of 28 businesses. The businesses have autonomy to make operational decisions and control their own commercial processes at a business level. The main supplier costs relate to hosting and maintenance costs, followed by hardware costs. Our suppliers are predominately UK & Europe based, followed by Latin American, with 6% operating in geographies that include Africa, Asia and North America. Supplier relationships are maintained at a business unit level.

Our policies

We have a number of policies in place which help us mitigate the risks to Vesta. These include:

- Disciplinary policy
- Equal opportunities & dignity at work policy
- Grievance policy
- Whistle blowing policy

We also have the Employee Handbook which aggregates a number of best practices and policies, including; ethical and moral obligations expected, equal opportunity and diversity, discrimination, bullying and harassment, criminal offences, health & safety, employee well-being, grievances, whistleblowing and disciplinary procedures. In addition to this, we have a dedicated online zone which focuses and provides resources and support for health & wellbeing.

Due Diligence and auditing

During our risk assessment we have reviewed the internal policies and processes that we have in place to enable us to assess our internal suppliers (our people). Vesta operates a central HR function, which is conducive to strong and clear controls. Knowledge of our external suppliers are centralised at a UK level, within a central library and risk assessment system. Suppliers considered higher risk are classified as Tier 1 suppliers. External assessments are made to understand the processes in place and approach the Tier 1 suppliers take to mitigating their own risk of Modern Slavery. These assessments produce an automated risk score, to allow us to review and focus on any suppliers of concern, and to gain a high-level profile of Vesta.

YEAR ENDED 31 DECEMBER 2024

MODERN SLAVERY STATEMENT

Our risk assessment

From the continued due diligence and assessment work undertaken, minimal percentage are considered Tier 1 suppliers, based on what we consider our higher risk criteria. Key performance indicators (KPIs) Vesta operates internally on a number of key KPIs. There are specific KPIs to ensure we can measure and understand our progress, focusing on key risks. These KPIs include specific targets on bringing each of our business units' suppliers into our new supplier software, completing our internal risk assessments, any relevant external assessments for those considered high risk and then any final remediation required.

Training

Training was rolled out during 2020 to ensure all employees were cognisant of the Modern Slavery Act and understood what they should be aware of to help mitigate any risks. All new recruits are required to complete this training as part of our onboarding process and training requirements are reviewed on a regular basis.

Board approvals

This statement is made pursuant to section 54(1) of the Act. Jonas Software UK's Executive Committee approved this statement in May 2025.

Signed by:



C28CDDCAF418D441

Richard Clancy Group CEO,
Vesta Software Group