

## Anti-Slavery and Human Trafficking Policy

Kortext Ltd

6th Floor, Avalon House, 26–32 Oxford Road, Bournemouth, Dorset, BH8 8EZ

Updated May 2025

## ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

### Introduction

At Kortext, we are committed to preventing acts of modern slavery and human trafficking, both within our business and our supply chain. This statement sets out the actions we have taken to understand the risks to our business and puts in place steps that are aimed at ensuring there is no modern slavery or human trafficking in our business or our supply chains.

This statement is made in line with the spirit of Section 54 of the Modern Slavery Act 2015 and relates to the organisation's actions for the 2024/25 financial year and going forwards.

Our organisation (Kortext) operates in the educational technology sector, and our headquarters is located in Bournemouth, Dorset. Formed in 2013, our main line of business activity is business and domestic software development, and we are the leading supplier to UK universities of digital content, learning and student engagement solutions.

### Relevant policies

As part of our commitment to preventing modern slavery and human trafficking, we have implemented the following policies which support our approach to preventing modern slavery and human trafficking:

- Anti-bribery Policy
- Equal Opportunities and Diversity Policy
- Bullying and Harassment Policy (UK team)
- Anti-discrimination and Anti-harassment Policy (Canadian team)
- Professional Conduct Guidance
- Public Interest Disclosure (Whistleblowing) Policy.

## Due diligence

To monitor and reduce the risk of modern slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- All suppliers are requested to sign a contract/term of business which confirms that they will comply with our anti-slavery and human trafficking policies and they are committed to preventing modern slavery and trafficking.
- We aim to improve the visibility of our chosen suppliers and contracts so members of staff can select goods and services from approved suppliers.

Kortext has not identified any instance of a breach of the Modern Slavery Act in its supply chain. Additionally, Kortext is of the view that a breach of the Modern Slavery Act would be a material breach.

In a scenario where Kortext identified any instance of modern slavery in its supply chain, it would seek to act in accordance with due process. Actions would include informing the police and terminating a contract. Through the implementation of these due diligence procedures, we are confident that we are assessing and monitoring the areas of risk in our business and supply chains and therefore reducing the risk of modern slavery and human trafficking occurring.

The organisation has undertaken a risk assessment to identify the potential sectors and suppliers where issues around human trafficking have historically arisen:

## IT equipment

Kortext purchases a range of electronic and IT equipment and software for its staff. Of those items, laptops, mobile phones and tablets can contain metals usually sourced in high-risk regions. Kortext is aware there is a well-documented risk of dangerous working conditions and child labour. However, Kortext's main supplier of laptops and desktop computers monitors its supply chain closely.

## **Outsourced services/agency workers**

Kortext has identified there is a potential risk with agency staff for cleaning. The use of agency workers is limited and normally undertaken via the use of local UK/Dorset-based agencies with robust recruitment practices. We have therefore assessed the risk of modern slavery or human trafficking occurring in our supply chain and deem it to be low risk.

We do not consider that we operate in a high-risk sector and our assessment is based on the nature of our business and our business transactions and given the policies we currently have in place. However, if we do find any evidence of a failure to comply with our policies then we will consider terminating our relationship with the supplier.

## **Human Resources (HR) and training**

Kortext has a comprehensive set of employment-related policies and procedures that prevent any possibility of modern slavery occurring within our workforce. Our HR department and the recruiting managers follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

A potential employee has to provide 'right to work' information which is checked at the interview and offer stages. All application forms are verified as being the applicant's own information, including taking a copy of the interviewee's original passport (or other appropriate identification) and any additional 'right to work' documentation (where applicable). Checking is completed by a third-party service, Care Check Ltd (Disclosure and Barring Service Registered Body Number 21479900004).

Where interviews are conducted via Teams or other electronic means, the candidate is required to present their original passport and other additional 'right to work' documentation (where applicable) in person to HR before their start date or on their first day.

All employees receive a written contract of employment on or before commencement in line with current employment legislation. In addition, HR ensures all members of staff (UK) complete annual training relating to

modern slavery and human trafficking to raise awareness of these issues, educate our teams and ensure compliance.

The Directors take responsibility for ensuring that this statement is up to date and reflects the actions the organisation is taking to tackle modern slavery and human trafficking.

This statement was approved by our Chief Financial Officer, who reviews and updates it annually.

Signature:



Name: Mark Edmondson, Director

Date: May 2025