



Modern Slavery and Human Trafficking Statement August 2025

Introduction from DBaaS Limited, United Kingdom.

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.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year 2024-2025.

Organisational structure

We are a provider of Database Management as a Service and Support in the IT sector. DBaaS Ltd focuses on database managed services and IT support services as an SME. Our services are primarily provided in the United Kingdom.

Our supply chains

Our supply chains include: DBaaS Limited operates a supplier policy and maintains a preferred supplier or sub-contractors list. We conduct due diligence on all suppliers or sub-contractors before

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allowing them to become a preferred supplier. This due diligence includes an online search to ensure that the particular organization or sub-contractor has never been convicted of offenses relating to modern slavery, and checks any one of the 4 checks as BPSS, CTC, SC, NPPV 3 Clearance checks through Vetting unit, Warwickshire Police and Disclosure Barring Service, Home Office. Our anti-slavery policy forms part of our contract with all suppliers, contractors, sub-contractors and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, sub-contractors, contractors we require that they confirm to us that:

- The principles of the fundamental conventions on labour standards of the International Labour Organisation (ILO).
- The principles of the UN Global Compact Programme And the "caring for climate" and "Women's Empowerment principles" initiatives.
- The Organisation for Economic Co-operation and Development (OECD) guidelines for Multinational Enterprises

Risk Assessment

Assessment of risk of modern slavery within our organisation

In 2024, we increased the detail of our risk assessment of our business by directly mapping the assessment of our employment practices in line with internationally recognised standards. Once again, our risk assessment revealed the risk of modern slavery in our UK business to be low. Our skilled and agile employees have greater control over their careers; and this significantly reduces the risk of modern slavery. We have a range of employment policies that protect and enhance our employee's experience at work.

We also considered the risk of modern slavery within our recruitment processes. In compliance with English law, our recruitment teams conduct a right to work check on all new joiners. This check is completed face to face so there is no need for the new employee to send off a passport or other identity documentation.

As we reported last year, external resourcing is a potential risk area for DBaaS Ltd UK plc, although the highly skilled, specialist contractors we engage from time to time are at low risk of modern slavery offences.

Our commitment to the ILO Fundamental Principles of eliminating discrimination in respect of employment and occupation, is reflected in our ongoing "Call it Out" campaign run by our HR and Employee Relations experts. The campaign includes training our executives and senior employees on how to tackle any unacceptable behaviour; not to be a bystander or enabler of discrimination or harassment but to lead by example.

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Assessment of risk of modern slavery within our supply chain

The risk assessment of the supply chain mapped the risk of modern slavery by commodity supplied and location of supply. The risk assessment was applied to all suppliers to DBaaS Ltd UK plc registered on the Global Procurement System (GPS) and therefore covered suppliers to all aspects of our business and organisation.

DBaaS Ltd UK has assessed its entire supplier base against our Core Principles of Sustainable Procurement. More than 98% of suppliers were found to meet our sustainability criteria in 2024; we no longer do business with the remaining 2%. Every new supplier is assessed for sustainability via an online survey.

Our 12 Core Principles of Sustainable procurement

1. Respect for Human rights
2. Compliance with applicable laws
3. Refusal of forced or compulsory labour
4. Refusal of child labour
5. Promotion of Equality and diversity
6. Employee wellbeing and development
7. Fair disciplinary practices
8. Freedom of association
9. Health and Safety
10. Confidentiality and intellectual property
11. Refusal of bribery and corruption
12. Reduction of Environmental impacts



Policies

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery and Human Trafficking Policy demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our workplace policies and procedures cover: a) Taking steps to eradicate modern slavery within the business b) Holding suppliers accountable over modern slavery c) For UK suppliers - paying employees at least the national minimum/living wage d) For international suppliers - paying employees prevailing minimum wages e) Contract termination if instances of modern slavery come to light.

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Our Values & Ethics programme is about who we are and the way we do business. Our seven core values and code of ethics underpin our corporate culture and permeate through our business practices, procurement behaviours and welfare policies:

- Honesty
- Boldness
- Trust
- Freedom
- Fun
- Modesty
- Team Spirit

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we have systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

We regularly conduct training for our procurement teams, sub-contractors, contractors and employees so that they understand the signs of modern slavery and what to do if they suspect it is taking place within our supply chain.

Supplier adherence to our values

We have zero tolerance for slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have a supply chain compliance programme in place.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and business, we provide training to our staff and require our business partners to provide training to their staff, contractors and suppliers.

Training sessions cover:

- How to assess the risk of slavery and human trafficking
- How to identify signs of slavery and human trafficking
- Initial steps if slavery or human trafficking is suspected
- How to escalate potential issues

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- What steps the organization should take if suppliers do not implement anti-slavery policies in high-risk scenarios

We have dedicated compliance teams, which consist of representatives from:

- Legal
- Audit and compliance
- Human resources
- Procurement
- Finance and Sales

The compliance team is led by Aru Kaya.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- No reports are received from employees, the public, or law enforcement to indicate that modern slavery practices have been identified.
- We appointed an independent third party to conduct an externally facilitated review to bring insights on ways we can tackle slavery and human trafficking. The third party uses appropriate KPIs to assess our effectiveness.

Further steps

Following a review of the effectiveness of the steps we have taken in 2024/2025 to ensure that there is no slavery or human trafficking in our supply chains, we intend to take further steps as recommended by the independent review to combat these issues.

SIGNATURE



NAME: Arumugam K
POSITION: CEO & Director DBaaS Ltd
DATE: 15/08/2024