

## Modern Slavery and Human Trafficking Statement December 2025

### Introduction from DBaaS Limited, United Kingdom.

DBaaS Limited is committed to preventing modern slavery and human trafficking in all its business activities and supply chains. Modern slavery is a crime and a serious violation of fundamental human rights. It can take various forms, including slavery, servitude, forced or compulsory labour, and human trafficking, all of which involve the deprivation of a person's liberty for personal or commercial exploitation.

This statement is made pursuant to **Section 54(1) of the UK Modern Slavery Act 2015** and sets out the steps by DBaaS Limited has taken during the financial year 2024–2025 to prevent modern slavery and human trafficking in our operations and supply chains.

### Our Organisation

DBaaS Limited is a UK-based small and medium-sized enterprise (SME) operating within the IT sector. We provide **Database Management as a Service (DBaaS)**, **database support**, and **associated IT support services**.

Our services are primarily delivered within the United Kingdom, and our workforce consists of skilled employees and specialist contractors engaged on a professional basis.

### Our Supply Chains

DBaaS Limited operates a supplier management policy and maintains a preferred list of suppliers, contractors, and sub-contractors. We undertake due diligence prior to onboarding any supplier or contractor and expect our supply chain partners to operate in line with ethical, legal, and professional standards.

All suppliers, contractors, and sub-contractors are required to comply with our anti-slavery standards as a condition of doing business with DBaaS Limited.

### Policies on Modern Slavery and Human Trafficking

DBaaS Limited has a zero-tolerance approach to modern slavery and human trafficking. Our **Modern Slavery and Human Trafficking Policy** reflects our commitment to acting ethically and with integrity in all business relationships and to implementing effective systems and controls to prevent slavery and human trafficking.

Our workplace and supplier policies include commitments to:

- Prevent modern slavery within our business and supply chains

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- Hold suppliers and contractors accountable for ethical labour practices
- Ensure UK suppliers pay at least the National Minimum Wage or National Living Wage
- Require international suppliers to pay prevailing minimum wages
- Terminate contracts where modern slavery or human trafficking is identified

Our approach is underpinned by our **Values & Ethics Programme**, which is embedded across our operations and procurement practices. Our core values are:

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

### Due Diligence Processes

To identify and mitigate the risk of modern slavery, DBaaS Limited has systems in place to:

- Identify and assess potential risk areas within our operations and supply chains
- Conduct supplier due diligence prior to engagement
- Monitor supplier compliance on an ongoing basis
- Provide clear escalation and whistleblowing mechanisms
- Protect whistleblowers who raise concerns in good faith

Supplier due diligence may include online checks, compliance questionnaires, contractual commitments, and, where appropriate, verification of relevant vetting or clearance standards.

### Risk Assessment

#### Risk Within Our Organisation

During the reporting period, DBaaS Limited reviewed its employment practices against recognised standards. The assessment identified the risk of modern slavery within our UK operations as **low**.

Our workforce consists of skilled professionals who have control over their employment choices, supported by clear HR policies, fair working practices, and transparent recruitment processes.

All new employees are subject to **right-to-work checks in accordance with UK law**, conducted prior to employment commencing.

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External resourcing is recognised as a potential risk area; however, the specialist and professional nature of contractors engaged by DBaaS Limited significantly reduces exposure to modern slavery risks.

### Risk Within Our Supply Chain

DBaaS Limited assessed modern slavery risk within its supply chain by considering:

- The nature of goods or services supplied
- Geographic location of suppliers
- Supplier sustainability and ethical practices

Suppliers are assessed against our **Core Principles of Sustainable Procurement**, and new suppliers are required to complete sustainability and compliance checks as part of onboarding

Where suppliers are found not to meet our standards, DBaaS Limited reserves the right to require remedial action or terminate the relationship.

### Core Principles of Sustainable Procurement

Our procurement approach is guided by the following principles:

1. Respect for human rights
2. Compliance with applicable laws and regulations
3. Prohibition of forced or compulsory labour
4. Prohibition 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. Protection of confidentiality and intellectual property
11. Zero tolerance of bribery and corruption
12. Reduction of environmental impact

### Training and Awareness

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DBaaS Limited provides appropriate training and guidance to employees, contractors, and relevant business partners to ensure awareness of modern slavery risks.

Training covers:

- Identifying indicators of modern slavery and human trafficking
- Assessing risk within operations and supply chains
- Reporting concerns and escalation procedures
- Actions to take where suppliers fail to meet anti-slavery expectations

### Measuring Effectiveness

DBaaS Limited measures the effectiveness of its actions to combat modern slavery and human trafficking through ongoing monitoring and annual review.

During the reporting period, effectiveness was assessed through:

- Completion of right-to-work checks for all new employees
- Supplier due diligence conducted prior to onboarding
- Review of supplier compliance against sustainability principles
- Monitoring of whistleblowing and reporting channels
- Delivery of modern slavery awareness training

No confirmed incidents of modern slavery or human trafficking were identified within our operations or supply chains during the reporting period.

DBaaS Limited is committed to continuous improvement and will continue to strengthen its policies, controls, and monitoring processes year on year

### Governance and Responsibility

Responsibility for modern slavery compliance sits with our dedicated compliance function, which includes representatives from:

- Legal
- Audit and Compliance
- Human Resources

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- Procurement
- Finance and Sales

Overall responsibility for this statement and its implementation rests with the Director of DBaaS Limited.

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 K

### **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: Aru K

POSITION: CEO & Director | DBaaS Ltd | DATE: 30/01/2026

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