

Modern Slavery Statement 2025-2026

Digital Business As A Service (DBAAs) Ltd

1. Introduction and Our Zero-Tolerance Commitment

Digital Business As A Service (DBAAs) Ltd is committed to conducting business ethically and with integrity. We recognise that modern slavery is a global crime that affects millions of people worldwide, and we are dedicated to ensuring that slavery and human trafficking have no place in our business operations or supply chains.

This statement is published in accordance with the Modern Slavery Act 2015 and sets out the steps we have taken during the financial year ending December 2024 to ensure that modern slavery and human trafficking are not taking place in our business operations or supply chains. We are committed to continuous improvement in our approach to combating modern slavery and will strengthen our efforts year on year.

Modern slavery encompasses slavery, servitude, forced and compulsory labour, human trafficking for exploitation, debt bondage and forced marriage. We acknowledge our responsibility to respect human rights and to conduct due diligence on our business relationships to identify and address any risks of modern slavery within our operations and supply chains.

2. Our Business Structure and Operations

Digital Business As A Service (DBAAs) Ltd operates as a technology services company headquartered in the United Kingdom. We provide comprehensive IT solutions including managed cloud services, web and mobile application development, database management, and digital consulting services to businesses across the UK and internationally.

Our business model is built on delivering high-quality technology services through a combination of in-house expertise and carefully selected technology partnerships. Our operations are primarily office-based, utilising modern digital infrastructure and cloud technologies to serve our clients efficiently and effectively.

Our workforce characteristics include:

- Skilled technology professionals, project managers, and support staff employed directly by the company

- All employees based in the UK working under employment contracts compliant with UK employment law
- Small, specialised team enabling close employee relationships and effective monitoring of working conditions

Our geographic presence encompasses primary operations in the UK, with service delivery extending to international clients through digital channels. Our physical presence is limited to UK office locations, which simplifies our ability to monitor working conditions and employment practices directly.

The nature of our business as a professional services organisation means that we have limited exposure to high-risk sectors traditionally associated with modern slavery. However, we recognise that modern slavery can occur in any sector and remain vigilant to potential risks within our operations and supply chains.

3. Understanding Our Supply Chains and Risk Assessment

Our supply chains are relatively straightforward, consisting primarily of technology vendors, professional service providers, and standard business suppliers. We have identified our key supply chain categories as technology and software suppliers including major cloud service providers, professional services such as legal and compliance advisors, and facilities and operations including office space and utilities providers.

We assess the modern slavery risk in our supply chains as generally low due to several factors. Most of our suppliers are established UK or multinational companies with robust compliance frameworks, and the technology sector suppliers typically employ skilled professionals in regulated environments. We have limited use of labour-intensive services or products from high-risk geographic regions, and there is strong regulatory oversight in the UK market where most suppliers operate.

However, we recognise that risks can exist particularly in:

- Facilities management and cleaning services where labour-intensive work may involve vulnerable workers
- IT hardware manufacturing supply chains, though we typically purchase through established UK distributors
- Third-party staffing services where temporary or contract workers may be at greater risk
- International suppliers operating in regions with weaker labour protections

Our risk assessment process involves regular evaluation of suppliers based on their geographic location, industry sector, business model, and existing compliance frameworks to identify any potential modern slavery risks.

4. Our Policies and Due Diligence Processes

We have established comprehensive policies and procedures to prevent modern slavery within our operations and supply chains. These policies reflect our commitment to ethical business practices and human rights protection.

Our Anti-Slavery and Human Trafficking Policy establishes a zero tolerance approach to modern slavery in all forms, providing clear definitions and examples of prohibited practices. The policy includes reporting mechanisms for suspected violations, investigation and response procedures, and provisions for regular review and updates.

Our employment and HR policies encompass:

- Right to work verification for all employees and prohibition of recruitment fees
- Transparent employment terms and conditions with protection of employee personal documents
- Grievance and whistleblowing procedures that protect reporters from retaliation

Our supplier due diligence process includes pre-qualification questionnaires that specifically address modern slavery risks, contractual clauses requiring compliance with modern slavery legislation, and regular monitoring of supplier performance and compliance. We conduct enhanced due diligence for suppliers in higher-risk categories or geographic regions.

We have established clear escalation procedures for addressing any identified concerns, including investigation processes, corrective action requirements, and ultimately termination of relationships where modern slavery risks cannot be adequately mitigated.

5. Training and Awareness Programs

We believe that education and awareness are fundamental to preventing modern slavery. Our training programs ensure that employees at all levels understand the risks of modern slavery and their role in preventing it.

All employees receive comprehensive induction training that includes modern slavery awareness, covering the definition of modern slavery, how to identify potential indicators, and the procedures for reporting concerns. This training is updated annually and includes case studies relevant to our industry and operations.

Our ongoing training initiatives include:

- Regular refresher sessions for all staff on modern slavery identification and reporting
- Specialized training for procurement and HR staff who have greater exposure to supply chain and employment risks
- Management training on investigation procedures and response protocols

We maintain training records to ensure all employees have received appropriate modern slavery awareness training and provide additional resources including policy documents, guidance materials, and access to external reporting mechanisms.

Our training programs are regularly reviewed and updated to reflect evolving risks, legal requirements, and best practices in the fight against modern slavery.

6. Monitoring and Performance Indicators

We have established key performance indicators to measure the effectiveness of our modern slavery prevention efforts and ensure continuous improvement in our approach.

Our monitoring framework includes regular supplier assessments through questionnaires and site visits where appropriate, tracking of training completion rates and effectiveness, and monitoring of reporting mechanisms including the number and nature of concerns raised.

Key performance indicators include:

- 100% completion rate for modern slavery training among all employees
- Annual supplier compliance assessments for all suppliers above defined risk thresholds
- Response time metrics for investigating and resolving reported concerns

We conduct annual reviews of our modern slavery risks and mitigation measures, including assessment of emerging risks in our supply chains and evaluation of the effectiveness of our policies and procedures. This review process informs updates to our policies, training programs, and due diligence procedures.

External benchmarking against industry best practices and regulatory guidance ensures that our approach remains current and effective in addressing modern slavery risks.

7. Reporting Mechanisms and Response Procedures

We have established multiple channels for reporting suspected modern slavery, ensuring that employees, suppliers, and other stakeholders can raise concerns safely and confidentially.

Internal reporting mechanisms include direct reporting to line managers, HR department, or senior management, along with anonymous reporting through our whistleblowing hotline. External reporting options include direct contact with relevant authorities and access to external helplines such as the Modern Slavery Helpline.

All reports are treated seriously and investigated promptly by trained personnel. Our investigation procedures ensure confidentiality for reporters and fair treatment for all parties involved. We maintain detailed records of all reports and investigations to identify patterns and improve our prevention measures.

Our response procedures include:

- Immediate assessment of reported concerns and implementation of interim protective measures where necessary
- Thorough investigation by qualified personnel with appropriate support from external experts where required
- Corrective actions ranging from additional training and monitoring to termination of supplier relationships

We provide regular feedback to reporters on the progress and outcomes of investigations, while respecting confidentiality requirements and legal constraints.

8. Continuous Improvement and Future Commitments

We are committed to continuous improvement in our approach to preventing modern slavery and will strengthen our efforts year on year. Our improvement plans include enhanced supplier monitoring through more frequent assessments and expanded on-site evaluations, strengthened policy frameworks based on emerging best practices and regulatory guidance, and expanded training programs including specialized training for higher-risk roles.

We will continue to collaborate with industry partners, government agencies, and civil society organisations to share best practices and contribute to broader efforts to combat modern slavery. This includes participating in industry initiatives and supporting policy development that strengthens protections against modern slavery.

Our future commitments include:

- Annual review and enhancement of our modern slavery risk assessment and mitigation measures
- Expansion of supplier due diligence to include more detailed assessment of sub-contractor practices

- Development of industry partnerships to address systemic risks in technology supply chains

We will continue to report annually on our progress and challenges in preventing modern slavery, maintaining transparency with our stakeholders and contributing to broader accountability in the fight against modern slavery.

9. Governance and Accountability

This Modern Slavery Statement has been approved by our Board of Directors and represents our formal commitment to preventing modern slavery in our operations and supply chains. The Board maintains oversight of our modern slavery prevention efforts through regular reporting and review processes.

Our Managing Director has ultimate accountability for ensuring compliance with the Modern Slavery Act 2015 and the effectiveness of our prevention measures. Day-to-day responsibility for implementing our modern slavery policies and procedures is delegated to our senior management team, with specific responsibilities assigned to HR, procurement, and operations functions.

We conduct annual reviews of this statement and our underlying policies and procedures, updating them as necessary to reflect changing risks, legal requirements, and best practices. This statement will be published on our website and made available to all stakeholders.

This statement is approved by:

Managing Director
Digital Business As A Service (DBAAs) Ltd

This statement covers the financial year ending December 2024 and will be reviewed annually. For questions about our modern slavery prevention efforts or to report concerns, please contact us at compliance@dbaasltd.com or through our confidential reporting hotline.