

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is made pursuant to Section 54(1), Part 6 of the United Kingdom Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 30 April 2025.

Ambeego LLP ('the Company', 'we', 'us' or 'our') is a Pakistani technology and services company that operates as a contractor and service provider to UK-based businesses. In this capacity, we form part of the supply chains of our UK clients who are themselves subject to the Modern Slavery Act 2015. We therefore produce this statement voluntarily and in good faith to demonstrate our compliance with the Act's standards, to provide assurance to our UK clients, and to reflect our own commitment to ethical business conduct.

We are committed to preventing slavery and human trafficking in our own operations and supply chain. We have a zero-tolerance approach to modern slavery and expect all those in our supply chain and our clients' supply chains who engage with us to uphold the same values.

Organisational Structure

Ambeego LLP is incorporated in Pakistan and delivers technology and professional services to clients in the United Kingdom and internationally. As a contractor, we embed our teams and capabilities within our clients' operations, functioning as an extension of their workforce.

Our workforce comprises skilled professionals based primarily in Pakistan, including software engineers, project managers, business analysts, and other technical specialists. Our own supply chain consists predominantly of local Pakistani suppliers of technology infrastructure, office services, and subcontracted specialist labour.

Because we operate within UK clients' supply chains, we recognise that our practices are subject to scrutiny under the Modern Slavery Act 2015 and we welcome that accountability. We actively cooperate with client-led audits, due diligence requests, and supplier assessments.

For more information about the Company, please visit our website: <https://www.ambeego.com/>

Policies

We operate a number of internal policies to ensure we are conducting business in an ethical and transparent manner, and to meet the expectations of our UK clients under the Modern Slavery Act 2015. These include the following:

- **Recruitment and Selection Policy** – We conduct thorough pre-employment checks on all prospective staff, including identity verification and right-to-work checks in compliance with Pakistani labour law. We do not use unlicensed labour brokers or recruitment intermediaries that cannot demonstrate ethical recruitment practices.
- **Supplier Code of Conduct** – All suppliers engaged by Ambeego are required to operate in full compliance with applicable laws in their jurisdiction and to uphold standards consistent with the UK Modern Slavery Act 2015. We seek written commitments from key suppliers and conduct periodic reviews.
- **Whistleblowing Policy** – We operate a confidential reporting mechanism enabling employees, contractors, and third parties to raise concerns about modern slavery, labour exploitation, or unethical practices within our operations or supply chain, without fear of reprisal.
- **Staff Code of Conduct** – Our code of conduct applies to all staff and embedded contractors. It makes clear that we have a zero-tolerance approach to modern slavery, forced labour, child labour, and any form of exploitation. Breaches are treated as gross misconduct.
- **Procurement Policy** – Our procurement procedures include modern slavery risk assessments for all new suppliers. We require suppliers to confirm they have reviewed their own supply chains for slavery and human trafficking risks, and we include anti-slavery clauses in all material contracts.
- **Client Engagement and Contractor Compliance Policy** – When onboarding with UK clients, we proactively provide copies of this statement and relevant policies. We agree to comply with any client-specific supplier codes of conduct relating to modern slavery, and we designate a point of contact for modern slavery queries.
- **Safeguarding Policy** – This policy outlines how staff should identify and report indicators of modern slavery or human trafficking, and details escalation routes both internally and to external authorities including the UK's National Referral Mechanism (NRM) and, in Pakistan, the Federal Investigation Agency (FIA).

We ensure that all staff and key suppliers are aware of these policies and are expected to adhere to the same standards.

Due Diligence

As a contractor operating within UK supply chains, we recognise our responsibility to conduct robust due diligence. Our procedures include:

- Internal audits of our own operations and working conditions on at least an annual basis.
- Supplier screening and background checks prior to engagement of any new subcontractor or third-party supplier.
- Inclusion of anti-slavery contractual clauses in all supplier and subcontractor agreements.
- Participation in client-led due diligence exercises, audits, and supplier questionnaires as requested by our UK clients.
- Periodic mapping of our supply chain to identify new or emerging risks.

Our due diligence procedures aim to:

- Identify and address potential modern slavery risks in our business and supply chains.
- Provide transparency and assurance to our UK clients and their stakeholders.
- Protect workers within our operations and extended supply chain.
- Create safe channels for whistleblowers to report concerns without fear of reprisal.

Risk and Compliance

The Company has assessed the nature and extent of its exposure to the risk of modern slavery and human trafficking through the following measures:

- Evaluating modern slavery risks for each new supplier prior to engagement.
- Maintaining an annual risk profile for key suppliers and subcontractors.
- Conducting regular supply chain mapping reviews to identify vulnerabilities.
- Reviewing working conditions, pay practices, and employment documentation for our own workforce annually.

As a Pakistan-based contractor, we acknowledge the heightened risk environment that may be associated with labour supply chains in certain sectors in Pakistan. Our own workforce is employed directly on formal employment contracts, paid at or above market rates, and subject to Pakistani labour law protections. We do not use informal labour brokers and we prohibit the use of bonded, forced, or child labour absolutely.

We recognise that our UK clients bear ultimate responsibility for the modern slavery compliance of their supply chains under the Act. We are committed to being a transparent and cooperative supplier, and we will promptly notify relevant clients of any identified or suspected modern slavery risk within our operations or supply chain.

Where evidence of non-compliance is found in our own supply chain, we will act immediately to remediate the situation and, where necessary, terminate the relationship with the non-compliant supplier.

Effectiveness

The Company uses the following Key Performance Indicators (KPIs) to measure the effectiveness of its approach to modern slavery:

- Annual contact with all key suppliers to assess their modern slavery practices and obtain updated compliance confirmations.
- 100% of new staff to complete modern slavery awareness training within their first month of employment.
- Audit of at least 50% of active suppliers each year.
- Zero substantiated incidents of modern slavery within our operations or supply chain.
- Annual review and update of this statement, to be shared proactively with all UK clients.
- Maintenance of a whistleblowing log to record and track any concerns raised, with outcomes reviewed quarterly.

Training Our Staff

Ambeego requires all staff to complete training on modern slavery and human trafficking. This training is mandatory for new joiners and refreshed annually. The training programme covers:

- How to identify the signs of slavery, forced labour, and human trafficking.
- What steps to take if slavery or trafficking is suspected within our operations or supply chain.
- How to escalate concerns confidentially using our internal whistleblowing channels.
- The external support available, including the UK National Referral Mechanism (NRM) and the Pakistan Federal Investigation Agency (FIA) Human Trafficking wing.
- The obligations of Ambeego as a contractor within UK supply chains under the Modern Slavery Act 2015.
- The consequences for suppliers who fail to comply with our anti-slavery policies, including contract termination.

This statement was approved by the Board of Directors of Ambeego LLP and is made on behalf of the Company in its capacity as a contractor to UK-based businesses.

Signed: *Syed Hammad Ali Shah*

Name: Founder, Ambeego LLP

Date: 21 May 2026