



coefficient

Modern Slavery and Human Trafficking Statement



Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 30th April 2022.

Coefficient Systems Ltd ('the Company', 'we', 'us', or 'our') is committed to acting ethically and to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Modern Slavery is the illegal exploitation of people for personal or commercial gain. It includes all forms of slavery, servitude, forced or compulsory labour, and human trafficking.

This policy does not form part of any employment contract, and may be amended at any time

Organisational Structure

Coefficient Systems Ltd has business operations in the United Kingdom.

We operate in the IT and consulting sector. The nature of our supply chains is as follows: we work with a number of suppliers who provide us with services, such as IT software and support.

For more information about Coefficient, please visit our website: <https://coefficient.ai>.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- Staff Code of Conduct
- Whistleblowing Policy

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

Risk and Compliance

1. We have evaluated the nature and extent of our exposure to the risk of slavery and human trafficking occurring in our UK supply chain through:
 - a. Creating an annual risk profile for key suppliers.
 - b. Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.
2. We do not consider that we operate in a high-risk environment because the majority of our supply chain is based in the UK and in low-risk industries, such as internet software and services.
3. We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.
4. When initiating a new business relationship with contractors or business partners, we will communicate our commitment to addressing the issue of modern slavery in our business and supply chains.

Effectiveness

Coefficient uses Key Performance Indicators (KPIs) to measure our effectiveness and ensure that slavery and human trafficking is not taking place in our business and supply chains. These KPIs are as follows:

- We will train our staff about modern slavery issues and increase awareness within the Company.
- We will carry out a regular audit of suppliers - 90% of suppliers each year.

Training our Employees

We require our staff to complete training and ongoing refresher courses on slavery and human trafficking. Our training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.

Responsibilities

Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Operations Manager has day-to-day responsibility for implementing this policy, monitoring its use, dealing with queries, and auditing internal systems to ensure they are effective against modern slavery.

Comments, suggestions and queries are encouraged from employees and should be addressed to the Operations Manager.

Next Steps

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking by:

- Aiming to audit 90% of suppliers annually.
- Providing regular training for the team about modern slavery issues.
- Including this policy in our onboarding materials, and ensuring new joiners also receive training.

This statement was approved by the Company Director.

John Sandall

John Sandall
CEO and Principal Data Scientist
Coefficient Systems Ltd

Date: 26th July 2022