

# Modern Slavery and Human Trafficking Statement

## Modern slavery and human trafficking statement

### Introduction

This statement sets out Momenta's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.

Momenta recognises that it has a responsibility to take a robust approach to slavery and human trafficking and are absolutely committed to preventing slavery and human trafficking in its corporate activities and ensuring that its supply chains are free from slavery and human trafficking.

### Organisation structure and supply chains

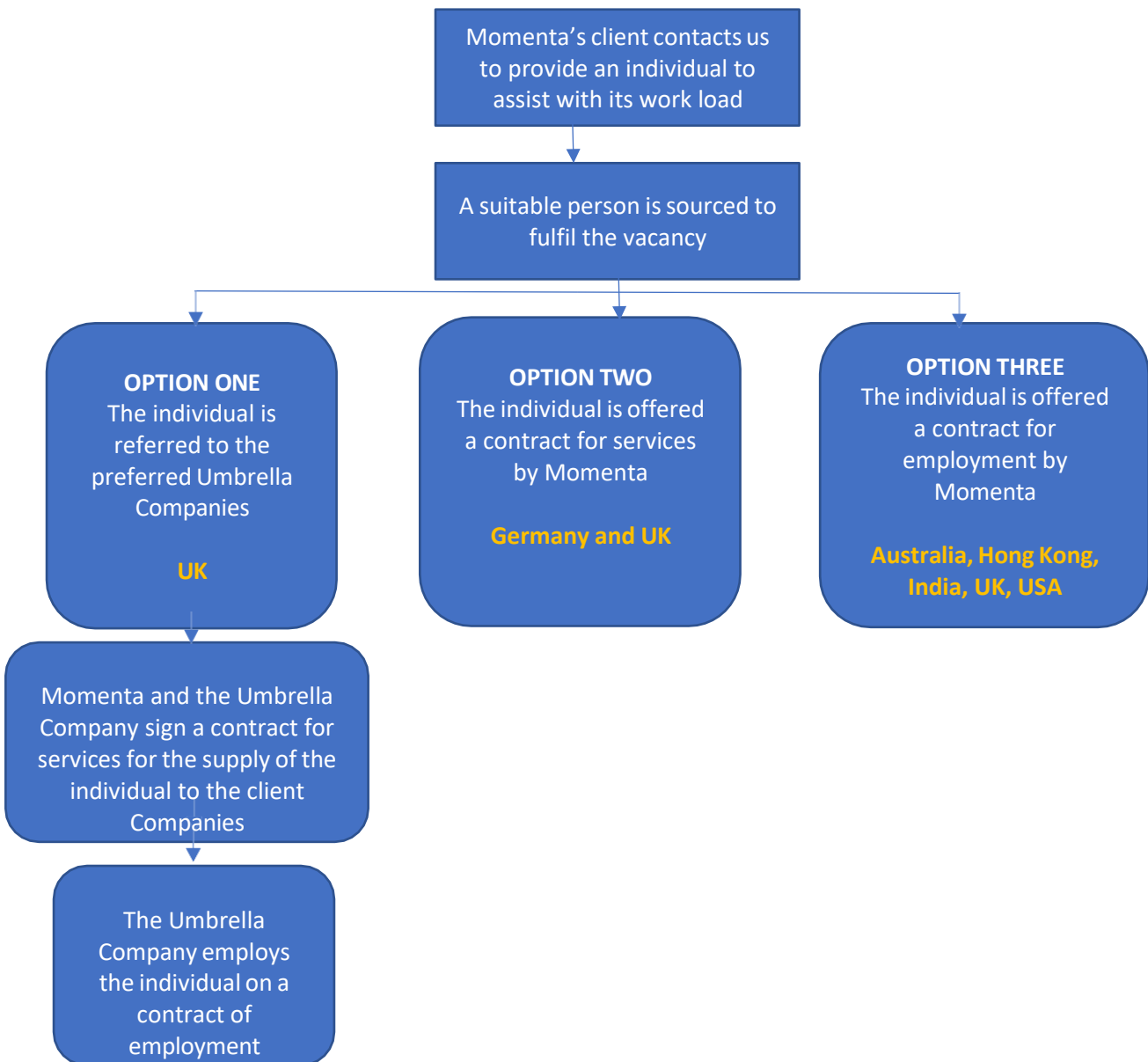
This is a single statement to cover the activities of all companies within the Momenta Group, comprising of the following entities:

- Momenta Acquisitions Limited
- Momenta Associates Pty Limited
- Momenta Customer Services Limited
- Momenta Group Holdings Limited
- Momenta Holdings (PPI) Limited
- Momenta Resourcing India Private Limited
- Momenta Interim Management Limited
- Momenta Operations Limited
- Momenta People Limited
- Momenta Performance Academy Limited
- Momenta Resourcing Asia Limited
- Momenta Resourcing Deutschland GmbH
- Momenta Resourcing Inc.
- Momenta Resourcing Pty Ltd
- Momenta Solutions Limited
- Momenta Group Limited

Momenta is a supplier of flexible, contingent resource primarily serving the financial services industry. Our head office is in London with further operations in Australia, Hong Kong, India, Germany and USA.

Our supply chain requirements are predominantly related to the deployment of people to our clients. We understand this is our biggest potential area of exposure.

Our supply chain usually runs as follows:



Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our

contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## **Responsibility**

Responsibility for our anti-slavery initiatives are as follows:

- **Policies:** Policies are regularly reviewed and updated by the HR Department in conjunction with any relevant area of the business.
- **Training:** Training is delivered to all staff to ensure they understand any signs of slavery and more importantly how to respond to any potential cases or risks.
- **Due Diligence Process:** All new suppliers are on-boarded only once approved by a Board member and any relevant checks are completed satisfactorily. When on-boarding a new client, we ensure all employees we place with them will receive the minimum (or enhanced) employment rights relevant for that country.
- **Risk Assessment:** All new suppliers are on-boarded only once approved by a Board member and any relevant background checks are completed satisfactorily.

## **Policies in relation to slavery and human trafficking**

We are committed to preventing Modern Slavery and have a number of policies and procedures in place to ensure our employees have a safe and supportive working environment. Our relevant policies, which are available to all staff include:

- **Corporate Social Responsibility Policy:** Outlines our commitment to maintain the highest standards of ethics and integrity in the conduct of our business activities.
- **Equal Opportunities Policy:** Our equal opportunity policy states our commitment to promoting equality of opportunity for all staff and job applicants. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit. The principles of non-discrimination and equality of opportunity also apply to the way in which staff treat visitors, clients, customers, suppliers and former staff members.

- **Whistleblowing Policy:** Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Recruitment Policy:** Our recruitment policy states our intent to recruit the person who is most suited to the particular job. Recruitment will be solely based on the applicant's abilities and individual merit as measured against the criteria for the job. Qualifications, experience and skills will be assessed at the level that is relevant to the job.
- We have also developed a specific Global Modern Slavery Policy. This policy states our zero-tolerance approach to modern slavery and outlines our expectations of all employees, stakeholders, and clients along with our supply chain our commitment to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.
- **Domestic Abuse policy:** There is an increased risk of Domestic abuse for our homeworkers so our Domestic abuse policy sets out the steps and support we are able to offer any employee going through any form of Domestic Abuse.

## **Due diligence processes**

We will not support or deal with any businesses knowingly involved in slavery or human trafficking.

When onboarding a new client or Umbrella Company we carry out a number of preliminary checks: web domain, company number, VAT number, credit check, company accounts have been filed and incorporation check.

Our contractors are engaged as per the supply chain diagram on page 2 above. Where that engagement is through an 'umbrella' company, a thorough process of due diligence is completed to ensure adherence to a range of standards including the company's policy and practices in relation to The Modern Slavery Act.

To minimize risk we work with a few preferred Umbrella Companies, Trafalgar Contractor Solutions Limited, PayStream Accounting Services Ltd and NASA Umbrella Ltd. Due diligence undertaken on the Umbrella Companies includes checking: who is in control of the company, the size of the firm (turnover, number of clients and staff), what standards they work to (e.g. ISO), their own approach to Modern Slavery and how they are audited.

We adhere to the national minimum wage (NMW)/national living wage (NLW) and the equivalent legislation in each of our overseas entities.

All employees are issued with contracts of employment detailing their obligations including notice periods. Our employees are free to serve notice at any time.

We check right to work documents for every employee, along with right of work checks in each of our global countries. We do not hold any of our employee's identity documents or passports.

We comply with, or enhance, all legislation in each country regarding sickness, holidays, time off for family e.g., maternity or paternity leave, working hours and minimum break times. We encourage staff to take their full holiday entitlements. Overtime (if applicable) is optional and is paid in line with local legislation.

We do not charge potential employees for our services. Payments for work completed is always paid in accordance with the employment contract in conjunction with local legislation.

### **Risk assessment and management**

To minimize risk, all contractors and employees globally undergo a thorough background screening process which verifies their identity and eligibility to work status.

Momenta employees working in our vetting teams receive stringent training on how to screen potential employees and contractors. Checks on contractors and employees include: Passport checks to confirm image and validity of passport, eligibility to work in the relevant country, proof of address in the relevant country and references.

Alongside the UK, we operate in Australia, Hong Kong, India, Germany and the USA. We recognise operations of this scope exposes us to increased risks and have reviewed our processes and procedures accordingly. All local Head office teams have received training in Modern Slavery.

As a company we have signed up to receive updates and guidance from the Home Office Modern Slavery Unit and attend relevant legal briefings.

### **Key performance indicators to measure effectiveness of steps being taken**

Our competency framework sets out the behaviours we expect from employees in their dealings with colleagues, clients, suppliers and contractors. These

competencies are reinforced through the recruitment, performance management process and reward strategy.

We have introduced the following Key performance indicators which will be reviewed annually:

- Training: Ensure that 100% of our Head Office employees receive Modern Slavery training during their induction. This was met in 2023-2024.
- Awareness: Deliver an internal awareness campaign to all staff annually regarding Modern Slavery, how to spot the signs and how to report any issues. This was met in 2023-2024.
- To ensure that the majority of supplier invoices are paid within specified timeframes. This was met in 2023-2024.

### **Training**

We know how vital it is for our staff to understand the issues of Modern Slavery, they know what signs to look for and how to report it. We therefore require all employees to complete training on modern slavery. The 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 organisation and what external help is available. This training is also delivered in all of our global territories.

We will continue to keep awareness high amongst employees to ensure they know how they can identify and prevent slavery and human trafficking, they know what to do to flag any potential issues and where to go for help.

### **Statement**

This statement was approved on 28<sup>th</sup> June 2024 by Momenta's board of directors who review and update it annually.



**Mark Westbrook**

Chief Operating Officer