

Cecure Intelligence Limited's Modern Slavery Act Statement for 2024

Cecure Intelligence Limited (“CIL” hereinafter) is committed to respecting human rights in all its operations and external business dealings. We recognise modern slavery, servitude, forced or compulsory labour and human trafficking (“Modern Slavery”) as grave violations of human rights and freedoms. Our values compel us to take our responsibilities in this area seriously.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “Act”) and outlines the steps CIL has taken during the financial year ended June 30, 2024 to ensure that Modern Slavery is not taking place in our supply chains or within our own business.

1) About our business

CIL delivers technology solutions using AI, IoT, Blockchain, and Cloud that drive business outcomes. We are customer-obsessed and very hands on, working in tandem with our clients to ensure a mutually satisfying experience. More information about our business can be found [here](https://cecureintel.com/company/about-us)

2) Scope of our assessments in 2024

During 2024, we focused our efforts on the CIL entity registered in the UK, the CIL entity registered in Nigeria which leads our African operations, and a sample of our suppliers that have a direct business relationship with CIL regardless of where these may be based. A list of the CIL entities identified in scope of the Act can be found within Annex 1 of this Statement.

3) Our progress

CIL has a Human Rights Policy and other policy documents that contribute to managing the risks of Modern Slavery. During the year, we conducted a review of the existing policies to ensure that there is explicit reference to these risks, where possible.

During 2024 we have:

- Assessed the risks of Modern Slavery within our own business.

Within the assessment of our own business we considered the nature of our business which is mostly office based work and the implementation and effectiveness of the policies we have in place to support human rights, as well as the controls and procedures embedded in our hiring practices, pre-employment checks and people management.

- *Conducted due diligence on a sample of our suppliers.*

We gathered information from our supplier databases to create an overview of our supplier population. We then proceeded to select a sample of our suppliers based on risk criteria that included the type of services provided to CIL, amongst others. In total we selected 5 suppliers which were then engaged through a survey which included questions relevant to assessing the risks of Modern Slavery. The results of this survey will inform our engagement with suppliers in 2025.

Within our direct supplier base, we also have a number of suppliers working at CIL premises, for example, providing services related to the running of our premises such as cleaners, caterers and security. We ensure to ask all suppliers working on CIL premises to ensure that these employees are paid at least the National or London Living Wage.

- *Reviewed our policies, business standards, and codes of conduct including our: Business Ethics Code, Human Rights Policy, Supplier Code of Behaviour, and Supplier Contract templates.*

We have updated our Business Ethics Code to include explicit reference to human rights and Modern Slavery as examples of issues that can be reported through our independent malpractice reporting service.

Our Supplier Code of Behaviour now includes prevention of Modern Slavery as an explicit requirement of the commitment to human rights which we ask our suppliers to adhere to.

We have created new contract clauses to set out our expectations regarding Modern Slavery; these are included in the standard template supplier agreements for any new contracts from July 2025 onwards.

- *Provided training*

Human Resources Managers and Legal & Compliance Managers have received basic training, which covered the offences as defined in the Act and how to identify warning signs of Modern Slavery. Our aim is to continue raising awareness of the

issues as they are complex and very difficult to identify.

4) Reporting mechanisms

Employees, business partners, and suppliers with concerns regarding Modern Slavery can report them through any of the following channels:

Email: info@cecureintel.com, legal-africa@cecureintel.com

Telephone: UK 01793265717

5) Next steps

We are committed to continue improving our approach to respecting human rights and preventing Modern Slavery. As part of this approach, in 2025 we will:

- Develop our existing supplier due diligence document to consider Modern Slavery risk.
- Review and, where necessary, improve processes created in 2024 to manage the risk of Modern Slavery.
- Continue with the delivery of training for our procurement and supplier management employees, and other employees as appropriate.
- Begin identifying appropriate KPIs for future measurement and reporting.

6) Process followed to issue this statement

The boards of the CIL entities identified within scope as listed in Annex 1, have approved this Statement.

OJ Adekoya

Chief Executive Officer

Annex 1

The entities covered by this Statement are Cecure Intelligence Limited (UK) and Cecure Intelligence Limited (Nigeria).