

Modern Slavery Statement

Financial year ending 31 May 2026 | Published 31 July 2026 | Next review due 31 July 2027

Ore Technologies Ltd is committed to preventing modern slavery, forced labour, human trafficking and exploitation in any form throughout our operations and supply chain. We recognise our ethical responsibility to act with integrity and transparency, and to ensure human rights are protected across all suppliers, subcontractors, partners and service providers engaged by Ore Technologies.

Although Ore Technologies is below the £36m statutory turnover threshold, we choose to voluntarily comply with the principles of the Modern Slavery Act 2015 and apply the same standards expected of larger businesses. This statement is approved by the Director and published on our website.

This statement sets out the steps Ore Technologies has taken during the financial year to prevent modern slavery and human trafficking in our operations and supply chain. For our standing commitments across the wider range of human rights, see our Human Rights and Modern Slavery Policy at oretechnologies.co.uk/human-rights.

1. Company structure and supply chains

Ore Technologies is a UK-registered digital transformation, IT consulting and technology solutions provider. Our operations include consulting services, SaaS-based technology solutions, cloud support, IoT development, and procurement of IT-related products from third-party suppliers and manufacturers. Our supply chain includes:

- UK-based software development and digital transformation partners
- Hardware, technology and cloud infrastructure providers
- Professional services providers and subcontractors
- Print-on-demand and e-commerce fulfilment partners
- International component and technology supply chain partners

We work primarily with reputable UK and global suppliers and established technology partners.

2. Our policies relating to modern slavery

We maintain an internal policy suite that directly supports our anti-slavery commitments:

- Modern Slavery & Human Trafficking Policy
- Supplier Code of Conduct
- Worker Welfare & Fair Labour Standards Policy
- Anti-Bribery & Ethical Procurement Policy
- Diversity, Equality & Inclusion Policy
- Recruitment & Vetting Policy
- Health & Safety Policy
- Whistleblowing Policy

Our standing Human Rights and Modern Slavery Policy is published in full on our website and extends these commitments across the wider range of human rights. All policies form binding conditions for employees, associate consultants and suppliers, and are available on request.

3. Due diligence in our supply chain

We conduct structured due-diligence checks for all suppliers, including:

- Supplier vetting and onboarding questionnaires
- Country-of-origin screening for higher-risk jurisdictions
- Assessment of human-rights, labour, ESG and recruitment practices
- Verification of certifications where applicable (ISO, SA8000, Cyber Essentials, and similar)
- Periodic review of suppliers' own modern slavery statements

Suppliers that fail to meet our required standards will not be approved.

4. Where our risk sits

As a United Kingdom professional services business with no manufacturing, no physical production and no raw material sourcing, the inherent modern slavery risk within our own operations is low. All directly employed staff are engaged on a properly operated PAYE payroll, paid at least the statutory National Living Wage or National Minimum Wage with rates reviewed at every annual uplift, and subject to right to work checks.

Our principal exposure sits in our supply chain. We have assessed the following as our areas of elevated risk:

- Sub-contracted software delivery labour, including offshore development teams, where the credible risks are excessive working hours, wage levels, and constraints on freedom of association.
- Hardware and equipment supplied through our IT procurement line, where the risk sits in upstream manufacturing beyond our direct visibility.
- Suppliers operating in jurisdictions with weaker labour protections or enforcement.

We concentrate our controls where the risk actually is, rather than distributing them evenly across a supply chain that is, in most respects, low risk.

5. Preventing exploitation, worker abuse and forced labour

We enforce the following principles across all suppliers and contractors:

- No forced labour or coercion
- No withholding of identity documents
- No recruitment fees charged to workers
- No restriction of movement
- No discrimination, violence, threats or intimidation
- Freedom of association and the right to terminate employment
- Fair wages, safe working conditions and reasonable working hours

Suppliers must comply with UK labour laws, ILO conventions and ethical employment standards.

6. Remedial actions and reporting

If we discover a breach or credible suspicion of slavery or trafficking, the supplier contract may be suspended or terminated; workers will be protected with remediation and safeguarding measures; we will report to appropriate authorities if criminality is suspected; and we document all actions taken and re-audit supply-chain relationships. We maintain an anonymous whistleblowing mechanism for concerns.

7. Measuring effectiveness

We track and review our commitments using KPIs such as:

- Percentage of suppliers agreeing to our Supplier Code of Conduct
- Percentage of staff trained in modern slavery and ethical procurement
- Number of suppliers audited or due-diligenced annually
- Incidents reported and remediation actions taken
- Number of procurement processes involving risk screening

Performance outcomes are shared internally and reviewed annually.

8. Staff training and awareness

We raise awareness of modern slavery through mandatory training for staff and consultants, training packages for recruitment and procurement stakeholders, guidance on identifying risk and reporting concerns, and ongoing communication on responsible sourcing.

9. Supplier engagement and chain of responsibility

We promote ethical sourcing by communicating expectations before contracts are signed, assessing worker welfare, working hours and wage practices, requiring corrective action where gaps exist, and collaborating with rather than penalising suppliers where appropriate. Suppliers who are unable to meet minimum standards will not be used.

10. Continuous improvement

We commit to updating this statement annually, expanding supply-chain mapping and audits, increasing transparency and traceability, strengthening risk controls and reporting mechanisms, and maintaining alignment with UK Government and international guidance.

11. Progress during the financial year ending May 2026

During the year we took the following steps to strengthen our approach.

We published a standing Human Rights and Modern Slavery Policy, extending our commitments beyond modern slavery to the full range of human rights, and naming the international frameworks we work to: the Universal Declaration of Human Rights, the United Nations International Covenants on Human Rights, the core labour standards of the International Labour Organization, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles on Business and Human Rights.

We carried out our first documented human rights risk analysis covering our own operations and our direct suppliers, prioritising identified risks by severity, likelihood and our ability to influence the outcome.

We confirmed that human rights and labour standards obligations flow down to sub-contractors on a back-to-back basis, using the same contractual mechanism already in place for confidentiality, security and skills commitments.

We reviewed our grievance mechanism to confirm that it is open to anyone affected by our activities, including the employees of our suppliers, and not only to our own staff.

We maintained our Cyber Essentials certification and were appointed to the Imperial War Museums Digital Transformation Support Framework, which required us to evidence our labour, equality and ethical standards.

Approval and contact

Approved by the Board of Directors of Ore Technologies Ltd.

David Alafifuni

David Alafifuni, Director, on behalf of the board of Ore Technologies Ltd

Date: 31 July 2026 | Next review due: 31 July 2027

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This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015. © Ore Technologies Ltd.