

POL Modern Slavery Act Statement

Label	Detail
Classification	Internal; Public Statement
Approver	Managing Director
Audience	Employees, contractors, suppliers, clients, regulators, and other interested parties
Initial date	2026-07-31
Author	IMSR

1. Purpose

This Modern Slavery Act Statement sets out Sedona Digital's commitment to preventing modern slavery, servitude, forced or compulsory labour, and human trafficking in its business activities and supply arrangements.

Sedona Digital operates as a trusted transformation partner specialising in Software/AI, Data/AI, Cloud Security, and Business Change, supporting blue-chip clients in Financial Services, Life Sciences, and Information Technology since 2008. This statement supports transparent communication to employees, contractors, suppliers, clients, and other interested parties regarding the standards expected across the organisation and its supply chain.

This statement is intended to support Sedona Digital's wider compliance framework and responsible business conduct.

2. Scope

This statement applies to Sedona Digital's organisational activities covering:

- Sedona Digital Ltd
156a Burnt Oak Broadway, Edgware, Middlesex, UK
Email: legal@sedona.digital
- Sedona Digital Gov Ltd
156a Burnt Oak Broadway, Edgware, Middlesex, UK
Email: legal@sedona.digital

- Sedona Digital SRL
Calea Dorobantilor 7, ap. 1, 400117, Cluj-Napoca, Cluj, RO
Email: legal@sedona.digital

This statement covers:

- all employees, directors, contractors, consultants, and temporary workers engaged by Sedona Digital
- all business functions involved in recruitment, onboarding, supplier selection, contracting, service delivery, and governance
- suppliers, subcontractors, and other business partners providing goods or services to Sedona Digital
- activities performed for clients in the United Kingdom, Romania, and other jurisdictions where Sedona Digital operates or delivers services

Sedona Digital recognises that the scope extends across Sedona Digital Ltd, Sedona Digital Gov Ltd, alongside the Romanian entity now referred to as Sedona Digital SRL, and this statement is written to reflect that combined operating context.

3. Definitions and Abbreviations

Definitions and abbreviations used in this document are maintained in the organisation's central definitions and abbreviations document.

4. Roles and Responsibilities

4.1 Top Management

Top Management is accountable for:

- approving this statement and promoting a culture of lawful, ethical, and respectful business conduct
- ensuring adequate oversight of modern slavery risks within Sedona Digital and its supply arrangements
- supporting appropriate resources for due diligence, reporting, awareness, and corrective action

4.2 IMSR

The IMSR function is responsible for:

- maintaining this statement within the compliance framework
- coordinating periodic review of modern slavery controls and related governance activities

- supporting internal awareness and escalation routes
- maintaining records relevant to reviews, incidents, actions, and improvement activities

4.3 People Managers and Hiring Managers

People managers and hiring managers are responsible for:

- applying fair and transparent recruitment and engagement practices
- identifying indicators of labour exploitation or coercion
- escalating concerns promptly through established reporting channels
- ensuring workers are treated in line with applicable legal and contractual requirements

4.4 Procurement and Supplier Owners

Those engaging suppliers or subcontractors are responsible for:

- applying proportionate supplier due diligence
- communicating Sedona Digital's expectations regarding lawful employment practices and ethical conduct
- reviewing risks associated with outsourced delivery, labour-intensive services, and geographic factors
- escalating concerns where supplier conduct appears inconsistent with this statement

4.5 Employees, Contractors, and Workers

All personnel are responsible for:

- acting in accordance with this statement and related policies
- remaining alert to indicators of modern slavery or human trafficking
- reporting any suspicion, concern, or breach without delay
- cooperating with internal reviews and investigations where required

5. Policy Statement

5.1 Organisational Profile and Commitment

Sedona Digital is committed to conducting business with integrity and to taking reasonable steps to reduce the risk of modern slavery in its own operations and supply chain.

As a professional services and technology organisation, Sedona Digital recognises that modern slavery risks may arise not only through direct employment arrangements, but also through subcontracting, recruitment intermediaries, outsourced services, and supplier practices. Sedona Digital does not tolerate any form of forced labour, bonded labour, involuntary work, deceptive recruitment, restriction of movement, withholding of identity documents, or exploitative working practices.

Sedona Digital is committed to:

- complying with applicable legal and regulatory obligations relevant to modern slavery and ethical employment
- maintaining recruitment and employment practices that support dignity, fairness, and lawful treatment
- assessing and addressing risks in supplier and subcontractor relationships
- encouraging prompt reporting of concerns without fear of retaliation for good-faith disclosures
- reviewing its approach periodically to support continual improvement

5.2 Governance

Modern slavery prevention is supported through Sedona Digital's wider compliance and management arrangements, including:

- leadership oversight of ethical business conduct
- documented policies and procedures relevant to employment, supplier engagement, conduct, and reporting concerns
- role-based accountability for recruitment, procurement, contract management, and issue escalation
- maintenance of records to support transparency, review, and follow-up actions

Where concerns are identified, Sedona Digital records the matter, assesses risk and impact, and determines appropriate action. This may include further due diligence, contractual review, management intervention, suspension of engagement, reporting to relevant authorities, or remediation measures as appropriate to the circumstances.

5.3 Due Diligence

Sedona Digital applies due diligence measures proportionate to the nature of the engagement and associated risk. These measures may include:

- verifying the legitimacy of suppliers, subcontractors, and intermediaries before engagement
- reviewing the nature of services provided and whether labour practices present elevated exploitation risk
- confirming that contractual arrangements clearly describe responsibilities and expected standards of conduct
- checking that payment arrangements are transparent and do not create conditions associated with coercion or unlawful deductions
- considering jurisdictional, sector, and delivery-model risks where relevant
- reviewing available information relating to adverse findings, ethical concerns, or labour-related issues

Higher-risk factors may include:

- use of temporary or contingent labour through third parties
- reliance on subcontracting chains with limited visibility
- operations in jurisdictions or sectors with elevated labour exploitation concerns
- worker populations that may be vulnerable due to immigration status, language barriers, debt dependency, or other circumstances

Sedona Digital expects concerns identified through due diligence to be assessed promptly and addressed through proportionate action.

5.4 Employment and Recruitment Practices

Sedona Digital supports lawful and fair employment practices across its operations. This includes:

- using transparent recruitment and onboarding processes
- communicating terms of engagement clearly
- avoiding misleading recruitment practices or inappropriate recruitment fees
- supporting compliance with applicable employment, right-to-work, and anti-discrimination requirements
- maintaining professional standards of treatment, working conditions, and conduct

Sedona Digital expects workers engaged directly or indirectly on its behalf to work voluntarily and to be free to leave in accordance with applicable contractual and legal arrangements.

Indicators that may prompt further review include:

- signs that a worker is unable to retain control of identity documents
- evidence of coercion, intimidation, threats, or restriction of movement
- unexplained wage deductions or unusual payment arrangements
- workers appearing dependent on a third party for transportation, accommodation, or communication in a potentially exploitative manner
- reluctance or inability to speak freely about working conditions

5.5 Supplier Expectations

Sedona Digital expects suppliers, subcontractors, and business partners to uphold standards consistent with this statement. In particular, suppliers are expected to:

- comply with applicable labour, employment, and human rights laws
- prohibit forced labour, compulsory labour, servitude, and human trafficking
- avoid child labour except where lawful work arrangements for young persons are specifically permitted and appropriately safeguarded
- provide fair terms, lawful pay practices, and safe working conditions
- maintain their own processes for identifying and addressing labour exploitation risks where relevant

- cooperate with reasonable requests for information relating to ethical and lawful workforce practices
- notify Sedona Digital of any known or suspected modern slavery issue connected with services provided to Sedona Digital

Where material concerns arise regarding a supplier's practices, Sedona Digital may take actions such as enhanced review, corrective action planning, contract reconsideration, or disengagement, depending on the seriousness of the issue and the supplier's response.

5.6 Reporting Concerns

Sedona Digital encourages prompt reporting of any concern relating to modern slavery, human trafficking, forced labour, exploitative recruitment, or unethical treatment of workers.

Concerns may be raised through line management, the IMSR function, Human Resources, or other established internal reporting routes. Reports from employees, contractors, and relevant external parties are treated seriously and handled with appropriate sensitivity and confidentiality.

Sedona Digital seeks to ensure that individuals who raise concerns in good faith are not subjected to retaliation, victimisation, or unfair treatment as a result of making a report.

Where a concern appears credible, Sedona Digital reviews the matter promptly and determines appropriate next steps, which may include:

- further fact-finding
- engagement with the relevant manager or supplier
- temporary control measures
- legal or specialist advice
- notification to competent authorities where required

5.7 Training and Awareness

Sedona Digital promotes awareness of modern slavery risks through communication and training activities appropriate to relevant roles.

Training and awareness topics may include:

- what modern slavery and human trafficking can look like in practice
- common indicators of exploitation
- expectations relating to ethical recruitment and supplier management
- how to escalate concerns
- responsibilities of managers, procurement personnel, and others involved in onboarding or supplier engagement

Additional awareness may be provided to higher-risk functions or roles where greater exposure exists.

5.8 Monitoring and Review

Sedona Digital reviews the effectiveness of its approach to modern slavery prevention as part of its wider compliance oversight. Monitoring activities may include:

- review of reported concerns and resulting actions
- review of supplier issues, onboarding checks, and contract-related escalations
- consideration of changes in business structure, service delivery, jurisdictions, or supply arrangements
- updates to awareness materials, processes, or controls where improvement opportunities are identified

This statement is reviewed periodically and updated where necessary to remain appropriate to Sedona Digital's operations and risk profile.

5.9 Approval

This statement has been prepared for Sedona Digital as a modern slavery transparency and communication document for internal and external use. Formal approval is recorded through the organisation's document approval arrangements.

7. Records

Records associated with this statement may include:

- approved version of the statement
- document review and approval records
- supplier due diligence records
- contract clauses and supplier acknowledgements where used
- recruitment and right-to-work verification records where applicable
- training and awareness records
- incident, concern, investigation, and action records
- management review or compliance review outputs relevant to modern slavery matters

8. Revision History

Version	Date	Author	Description of Change
1.0	2026-07-31	IMSR	Modern Slavery Act Statement created for Sedona Digital covering governance, due diligence, supplier expectations, reporting, training, and review arrangements