



# Modern Slavery Act 2015 Policy

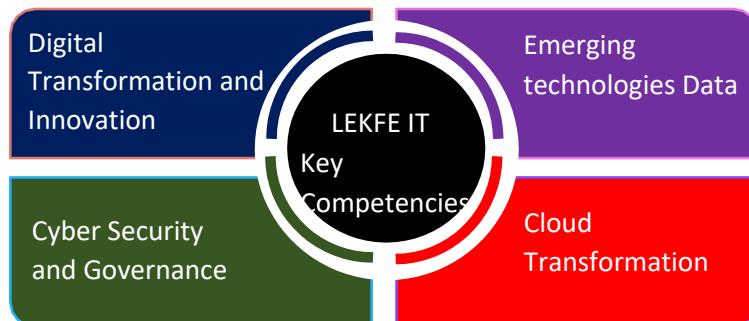
We are committed to improving our practices to combat slavery and human trafficking. Lefke IT (LEKFE IT) commit its obligations under the Modern Slavery Act 2015 seriously and has robust working practices to comply with its obligations. This policy document sets out those practices and gives insight into the supply chain and business processes of the our organisation.

***Any concerns from any of LEKFE IT' colleagues, contractors, associates, or other stakeholders regarding a likely risk of, or actual, breaching of our policy or the Legislation must be raised to the CEO at the earliest opportunity.***

## Organisation's structure and business

Technology and Innovation provider. We work in partnership with major private, public and third-party organisations in the UK. our value proportion is that over the years our architecture and innovation team developed cloud solutions, methodologies, help safeguard public-facing services and apply latest digital thinking and delivery disciplines to make sure the future of Public Services is citizen-centric.

Our practice is focused into four broad competency areas, as illustrated below.





Our team comprises recognised industry experts who are specialists in the design and delivery of flexible, high quality, and citizen-centred services for a digital age. Our delivery model comprises Permanent staffs and contractors; and partner firms (Subject Matter Experts ) to deliver collectively our products and services.

## OUR SUPPLY CHAIN

LEKFE IT has a very successful history of working with partner organisations and associates and our business operating model relies on an integrated and seamless service to clients, regardless of which mix of resources is delivering that service.

At any one time, we will have circa over 50 Partners (most of whom are SMEs) and we have a pool of 200k consultants out of which 30% are SC cleared and we have used many consultants in previous successful projects working alongside LEKFE IT permanent member of staff to deliver our agreed outcomes.

Our supply chain is underpinned by a rigorous contractual process which means that every partner has either a Partner Agreement or a Framework Consultancy Agreement in place. Both documents have specific obligations to comply with our Anti-Slavery and Human Trafficking Policy. Each partner contractually warrants that they will comply with this policy. Furthermore, we have rigLekfe IT of audit to enable us to ensure the policy is being enforced, which we exercise. Each of our associates and contractors have either an Associate or Contractor contract which contains a copy of this policy. We also have rigLekfe IT of audit for both of these partners, which we do carry out on a random basis.

## PROCESSES AND ACCREDITATION

As an experienced and mature service provider, all of our services are underpinned by robust ISO27001 certified processes and a variety of industry accreditations. These currently include: and Cyber Essentials and Cyber Essentials Plus.

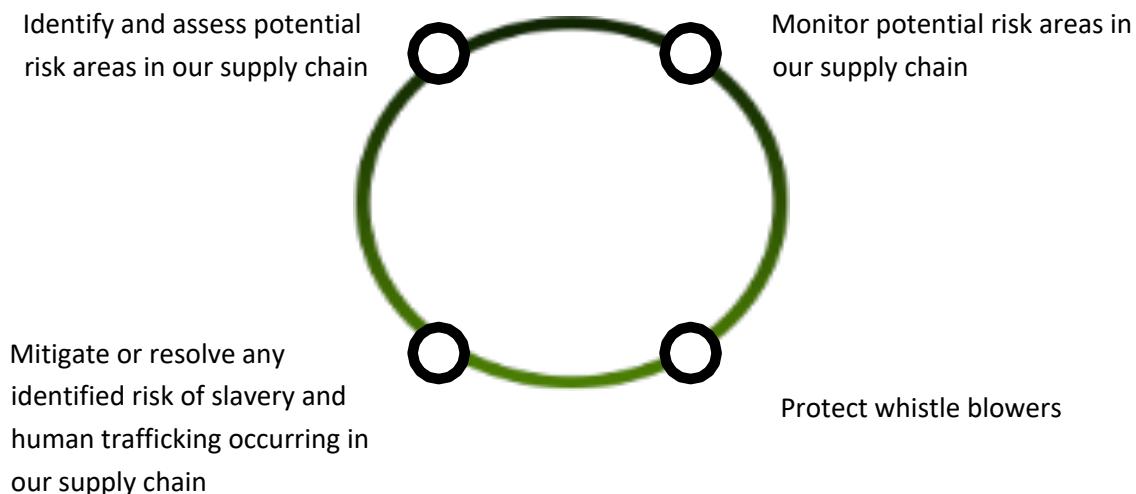
## OUR ANTI SLAVERY AND HUMAN TRAFFICKING POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our supply chain.

Our policies include a plan to audit suppliers to ensure adherence to our supplier requirements and ensure that our supply chain is free from slavery and human trafficking.

## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk in this regard, we have established systems designed to:



These processes and checks are managed through the relationships between LEKFE IT colleagues and their allocated partners, contractors, and associates.

## SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance of slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have a dedicated compliance support team which requires involvement from the following departments to support and ensure our adherence to the Modern Slavery Act 2015:



## MEASURING EFFECTIVENESS AND STEPS BEING TAKEN

LEKFE IT will continue to follow its due diligence processes of auditing suppliers and partners during the coming year. With select suppliers this will go beyond audit and contractual compliance and will seek direct engagement with workers on sites.



## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking, in our supply chains and our responsibility, we provide regular training to our colleagues. We also require our Partners to provide training to their staff, suppliers and providers in their respective supply chain.

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30<sup>th</sup> April 2022.*

## Sifaya Vellaithamby

*Chief Executive Officer*

*Lekfe IT*

*1<sup>st</sup> May 2022*