



Datametrics Installation Services
Limited

Modern Slavery and Human
Trafficking Statement & Policy

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Reviewer list

Name	Role
R Hughes	Operations Director

Approvals

Name	Signature	Title	Date of issue	Version
R Pannell	R Pannell	Director	01/09/2026	8.0

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1.0 Statement of Compliance and Scope

Datametrics Installation Services Limited (“Datametrics”, “DM” or “the Company”) confirms, for the purposes of this framework submission, that it is responding as a relevant commercial organisation and that this statement is intended to demonstrate compliance with section 54 of the Modern Slavery Act 2015 and associated statutory guidance. The statement sets out the steps taken during the financial year to prevent slavery, servitude, forced or compulsory labour and human trafficking in the Company’s own operations and supply chains.

Zero-tolerance commitment. Datametrics will not knowingly enter into, continue, or benefit from any business relationship involving modern slavery or human trafficking. Concerns are investigated promptly and may result in corrective action, suspension, termination of supplier approval, reporting to the appropriate authority, and support for affected individuals where relevant.

2.0 Framework Compliance Matrix – Section 54(5)

Requirement	How This Statement Addresses It	Primary Section(s)
a) Organisation structure, business and supply chains	Company structure, operating model, service lines, labour model and principal supply-chain categories are explicitly described.	3, 4
b) Policies on slavery and human trafficking	Zero-tolerance position and supporting policies are identified, with contractual expectations for employees, subcontractors and suppliers.	5
c) Due diligence processes	A risk-based supplier onboarding, screening, approval, audit, escalation and review process is defined.	6
d) Risk areas and management actions	Higher-risk categories, geographies and labour arrangements are identified with controls and escalation measures.	7
e) Effectiveness and performance indicators	Specific measurable KPIs, targets, reporting owners and review arrangements are set out.	8
f) Training and capacity building	Induction, refresher, toolbox, role-specific and supply-chain awareness arrangements are detailed.	9

3.0 Organisation Structure and Business

Datametrics Installation Services Limited is a UK technology-infrastructure installation and services business. The Company operates predominantly throughout the United Kingdom, with central management from Northamptonshire and regional/remote delivery resources. Projects may also be delivered overseas where required by clients.

Services include structured network cabling, fibre infrastructure, telecommunications installation, Wi-Fi and active network support, security and smart-building systems, data-centre and rack works, associated electrical works, diagnostics, maintenance and project support. Delivery is generally project-specific and client-led, resulting in a mobile workforce and a supply chain that varies by location, programme and technical requirement.

The workforce and delivery model can include directly employed staff, approved subcontractors, specialist labour, manufacturers, distributors and suppliers of cabling, fibre, containment, electrical and construction-related materials. Where projects are delivered outside the UK, local labour, logistics and materials may also be used, subject to client, quality, security and compliance requirements.

4.0 Supply Chains

The Company's principal supply-chain categories are:

- approved subcontract labour and specialist technical resource;
- network, fibre, electrical and construction materials;
- manufacturers, distributors and wholesalers;
- logistics, transport, accommodation and project support services;
- temporary or agency labour where required; and
- overseas local suppliers or labour where project delivery requires local sourcing.

UK suppliers are expected to comply with UK employment and labour law and with the Datametrics Subcontractor & Supplier Code of Conduct. Overseas sourcing is subject to additional risk consideration, particularly where local labour protections, recruitment practices, worker documentation or supply-chain transparency may be weaker.

5.0 Policies and Contractual Controls

Datametrics maintains a policy framework intended to prevent exploitation and establish expected standards of conduct. Relevant documents include:

- Modern Slavery and Human Trafficking Policy / Statement;
- Ethical Purchasing / Ethical Procurement Policy;
- Subcontractor & Supplier Code of Conduct;
- Recruitment and Selection Policy;
- Whistleblowing / speak-up arrangements;
- supplier and subcontractor approval / assessment controls; and
- disciplinary, grievance and compliance arrangements applicable to employees and workers.

Contractors and suppliers are expected to prohibit forced labour, trafficking, servitude and exploitative recruitment; comply with applicable employment, wage, working time and right-to-work requirements; maintain appropriate records; cooperate with audits and information requests; and notify Datametrics of suspected or actual modern slavery concerns. Material non-compliance may result in corrective-action requirements, suspension or termination of the commercial relationship.

6.0 Due Diligence Processes

Datametrics applies proportionate, risk-based due diligence to employees, subcontractors, suppliers and project-specific supply chains. The process includes the following controls:

- 1. Pre-engagement screening:** Supplier/subcontractor identity, ownership/contact details, service scope, location, competencies and relevant compliance information are reviewed before approval.
- 2. Policy and code acceptance:** Applicable suppliers and subcontractors are required to acknowledge Datametrics standards, including the Subcontractor & Supplier Code of Conduct and modern slavery expectations.
- 3. Labour checks:** Right-to-work and employment-status controls are applied to direct labour and, where relevant, evidence is sought regarding subcontract labour, recruitment routes and worker welfare.
- 4. Risk assessment:** Risk is considered by country, labour intensity, use of migrant/temporary labour, recruitment intermediaries, material origin, supplier transparency and previous performance.

5. Enhanced due diligence: Higher-risk suppliers/projects may be subject to additional questionnaires, evidence requests, contractual controls, interviews, site/project checks or management approval before use.

6. Ongoing monitoring: Approved suppliers are monitored through performance reviews, contractor assessments, audits, project management, worker feedback and issue escalation.

7. Corrective action and escalation: Concerns trigger investigation and documented actions. Datametrics may require remediation, suspend new work, remove approval, terminate engagement or report concerns to appropriate authorities.

8. Periodic review: Modern slavery controls are reviewed through management review and internal audit, with lessons incorporated into procurement, supplier approval and training arrangements.

7.0 Risk Assessment and Management

Datametrics considers the overall risk of modern slavery in its directly controlled UK operations to be comparatively low, but recognises that risk can increase in complex, labour-intensive or less transparent tiers of the supply chain. The following areas receive particular attention:

Risk Area	Why Risk May Arise	Key Controls	Residual Approach
Imported construction / technology materials	Limited visibility beyond first-tier supplier; source-country labour conditions	Approved suppliers; manufacturer/distributor traceability where available; risk-based evidence requests; supplier audits	Escalate where origin or labour conditions cannot be satisfactorily evidenced
Overseas project delivery	Different labour law, enforcement and recruitment standards	Project-specific risk review; client collaboration; vetted local suppliers; enhanced contractual controls	Management approval and increased monitoring for higher-risk locations
Subcontract / temporary labour	Potential worker dependency, recruitment fees, document retention or wage abuse	Approved subcontractors; worker identity/right-to-work checks; code of conduct; site management and speak-up routes	Investigate worker welfare indicators and suspend suppliers where necessary
Labour intermediaries / agencies	Reduced direct visibility of recruitment and pay practices	Due diligence on agency; contractual requirements; evidence requests; worker feedback	Enhanced review where agency chain is complex or opaque
High-volume / urgent mobilisation	Time pressure may weaken normal checks	No bypass of mandatory approval controls; escalation route for urgent exceptions	Retrospective review of any formally approved exception and corrective action

Indicators that may trigger escalation include unexplained recruitment fees or debt, withheld identity documents, restricted freedom of movement, unusual control by a third party, workers appearing fearful or coached, discrepancies in pay or hours, poor living conditions linked to employment, inability of a supplier to explain its labour chain, or credible allegations from workers, clients or other sources.

8.0 Effectiveness and Key Performance Indicators

The Company measures effectiveness through a combination of compliance, training, audit, supplier-management and incident indicators. Performance is reviewed at least annually, and significant issues are escalated to senior management.

KPI	Target / Expectation	Evidence Source	Review Frequency
Modern slavery training completion	100% of relevant employees complete induction / assigned training	Training records / LMS / toolbox records	At least annually
Supplier code / policy acknowledgement	100% of newly approved relevant suppliers/subcontractors acknowledge required standards	Supplier approval records	Onboarding / renewal
Risk-based supplier assessments	100% of suppliers identified as higher risk receive enhanced review	Risk assessments / questionnaires	As identified; annual review
Corrective actions closed	100% of agreed modern-slavery corrective actions tracked to closure or formal escalation	Audit / CAPA records	Monthly until closed
Confirmed modern slavery in own operations	Target: zero	Incident / HR / compliance records	Continuous
Confirmed modern slavery in supply chain	Target: zero; any case investigated and remediated/escalated	Incident / supplier records	Continuous
Internal audit findings	All findings assigned an owner and target date	Internal audit reports	Per audit programme
Speak-up awareness / accessibility	Reporting route communicated to employees and relevant subcontractors	Induction, posters, toolbox talks, policy communications	Ongoing / annual review

Where a target is not achieved, the responsible manager records the cause, corrective action, owner and completion date. The objective is continuous improvement rather than reliance on a simple “zero incidents” measure, recognising that effective controls should also encourage concerns to be raised and investigated.

9.0 Training and Capacity Building

Datametrics provides modern slavery awareness and capacity building appropriate to role and risk. Training arrangements include:

- company induction and staff handbook awareness for employees;
- periodic refresher training and toolbox talks;
- awareness posters and guidance, including materials suitable for different worker groups/languages where required;
- Supply Chain Sustainability School or equivalent modern slavery learning resources;
- role-specific guidance for procurement, supplier approval, project management, supervisors and managers on risk indicators, escalation and evidence requirements;
- briefing of subcontractors and suppliers on the Company’s expected standards and speak-up route; and
- additional project/location-specific briefing where overseas or higher-risk sourcing is involved.

Training is intended to enable staff to recognise common indicators of exploitation, understand that a worker may be reluctant or unable to self-identify as a victim, preserve confidentiality, avoid actions that increase risk to an affected worker, and escalate concerns promptly to the Compliance Team.

10.0 Reporting Concerns, Remediation and Protection

Employees, subcontractors, suppliers and other stakeholders are encouraged to report suspected modern slavery, trafficking or worker exploitation. Concerns may be raised with line management or directly with the Datametrics Compliance Team at compliance@datametrics.co.uk. Reports should be treated sensitively and, so far as reasonably possible, confidentially.

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The Company will not tolerate retaliation against a person who raises a concern in good faith. A concern will be triaged according to urgency and potential risk to individuals. Datametrics will seek appropriate specialist or authority support where required and will prioritise worker safety. Commercial action against a supplier will be proportionate to the facts and will consider whether immediate termination could itself worsen risks to affected workers.

11.0 Governance and Accountability

Overall accountability rests with the Board of Directors. Day-to-day coordination sits with the Compliance Team, supported by Operations, Procurement, HR and project management functions. Employees and subcontractors are responsible for complying with the policy, completing required training and reporting concerns; they are not individually designated as “Slavery Compliance Officers”.

The statement and supporting controls are reviewed annually and sooner where a material change occurs in legislation, guidance, business activities, supply-chain risk or a significant incident.

12.0 Approval, Publication and Annual Review

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. For a company, the final statement is to be approved by the Board of Directors and signed by a Director. The approved statement should be published on the Company website with a prominent homepage link and retained as part of the annual compliance record. The Company should also consider publishing the statement to the Government Modern Slavery Statement Registry.

Statement period	Financial year 2025/2026
Board approval date	08/09/2026
Signed for and on behalf of Datametrics Installation Services Limited	R Pannell, Director
Signature	