



Modern Slavery and Human Trafficking Statement

(Issued under Section 54 of the UK Modern Slavery Act 2015)

1. Introduction

Modular Digital Ltd. is committed to preventing modern slavery and human trafficking in all our business operations and supply chains. We uphold the highest standards of ethics, integrity, and respect for human rights, and we expect the same from everyone we work with.

Modern slavery is a crime and a violation of fundamental human rights. It can take many forms including slavery, servitude, forced and compulsory labour, and human trafficking.

This statement outlines the steps Modular Digital Ltd. has taken, and continues to take, to ensure that slavery and human trafficking are not taking place within our business or supply chains.

2. Our Business

Modular Digital Ltd. is a UK-based digital agency providing human centred research, design, branding, and web development services to corporate and SME clients.

We operate primarily in the UK and may engage contractors or suppliers in other regions for software development, hosting, and related services. Our business operates in the digital and creative services sector, which we consider to have a relatively low risk of modern slavery, but we remain alert and proactive in identifying potential risks.

3. Our Supply Chain

Our supply chain includes:

- Technology and software providers (e.g., hosting, cloud services, and hardware suppliers).
- Freelancers and contractors supporting digital, design, and technical work.
- Professional services such as accounting, legal, and marketing.
- Work place suppliers such as rental of desks at co-working spaces

We recognise that some elements of this supply chain, particularly hardware manufacturing and outsourced development, can present higher risks of labour exploitation.

4. Our Policies

We have established the following internal policies to ensure we conduct business ethically and transparently:

- **Modern Slavery and Human Trafficking Policy** – outlines our zero-tolerance approach and reporting mechanisms.
- **Supplier Code of Conduct** – requires all suppliers and contractors to adhere to fair labour standards and comply with all applicable laws.
- **Whistleblowing Policy** – provides safe and confidential channels for reporting concerns about unethical or illegal practices.

5. Due Diligence and Risk Assessment

To identify and mitigate potential modern slavery risks, we:

- Assess suppliers based on geography, industry, and nature of services.
- Prefer to engage suppliers with published modern slavery statements or equivalent commitments.

- Include contractual clauses requiring compliance with anti-slavery legislation where appropriate.
- Conduct periodic reviews of key suppliers to ensure ongoing compliance.

6. Training and Awareness

We provide awareness materials and training to staff involved in procurement, recruitment, and supplier management to help them identify indicators of modern slavery and understand how to report concerns.

7. Reporting Concerns

Any employee, supplier, or stakeholder can report suspected instances of modern slavery by contacting emma@thisismodular.co.uk. All reports are taken seriously, investigated promptly, and handled confidentially.

8. Continuous Improvement

We are committed to reviewing and improving our practices annually to ensure they remain effective in preventing modern slavery.

Future actions include:

- Expanding supplier due diligence processes.
- Increasing staff awareness and training.
- Strengthening our supplier monitoring framework.

9. Approval

This statement has been approved by the Directors of Modular Digital Ltd. and will be reviewed annually.

Signed:



Name: Emma Millington

Position: CEO

Date: 10/01/2026