



Modern Slavery and Human Trafficking Statement

Introduction

This statement is issued in accordance with Section 54, Part 6 of the Modern Slavery Act 2015.

This document outlines the steps Penta has taken to ensure that slavery and human trafficking do not occur within our business or our supply chains.

Penta is firmly opposed to slavery, trafficking in persons, and forced labor in any form. We are committed to transparency within our organisation and in our efforts to combat modern slavery throughout our supply chains.

We require all contractors, suppliers, and business partners to adhere to the same high ethical standards.

Organisation structure and suppliers

Penta operates in the United Kingdom, Asia, the European Union and the United States, providing reputation intelligence solutions to corporate businesses. Our offerings include collecting, analysing, and reporting on stakeholder sentiment and reputation metrics.

We rely on external suppliers to assist with data collection across time zones. While most suppliers are based in the UK, EU and US, we occasionally source offshore. Recognising the heightened risk associated with foreign suppliers, we take additional steps to evaluate and qualify them prior to engagement.

We strive to work with suppliers who demonstrate transparency and integrity, and we require them to comply with all applicable laws and regulations. Furthermore, we expect our suppliers to promote these high standards within their own supply chains.

Responsibilities

Our HR and Finance departments oversee the implementation and maintenance of this policy, under the guidance of key stakeholders:

- President: Ensures regular stakeholder meetings to review compliance and effectiveness.



- **Chief Financial Officer (CFO):** Develops and monitors controls for supplier onboarding and annual reviews.
- **Leadership Team:** Assesses risks, updates policies in response to regulatory changes, ensures training delivery, and communicates policies to employees and suppliers.

Each party has specific responsibilities to ensure compliance:

President: Reviews policy implementation and overall effectiveness, ensuring alignment with organisational goals.

CFO: Develops robust due diligence processes for supplier assessment and reviews existing suppliers annually.

Leadership Team: Conducts risk assessments, oversees training and due diligence, and ensures clear communication with stakeholders. They also investigate potential issues and implement corrective measures as needed.

Due Diligence Checks on Suppliers

1. **New Suppliers:**
 - Evaluate based on reputation, location, and track record.
 - Confirm financial stability through sources such as Companies House and other verification methods.
 - Conduct specific checks related to modern slavery, trafficking, and labor practices.
2. **Existing Suppliers:**
 - Review all existing suppliers annually.
 - Assess compliance with Penta's anti-slavery policies through supplier statements, questionnaires, or website reviews.
 - Address any areas of concern promptly and effectively.

Performance Monitoring

To ensure the policy's success and ongoing improvement:

- **Stakeholder Oversight:** Penta's President and Leadership Team will hold regular, minuted meetings to review compliance and discuss potential enhancements.
- **Supplier Vetting:** Penta's CFO will report on the effectiveness of new supplier vetting processes and annual reviews.
- **Policy Evolution:** Penta's Leadership Team will assess the impact of training, policy updates, and any changes in regulations, ensuring alignment with best practices.



Training and Awareness

Penta is committed to educating employees on the risks of modern slavery and human trafficking.

Training is provided to relevant staff to ensure they understand:

- The requirements of the Modern Slavery Act.
- How to identify and mitigate risks within supply chains.
- Their role in maintaining compliance.

Commitment to Continuous Improvement

Penta recognises that combating modern slavery is an ongoing effort. We are committed to:

- Enhancing our due diligence processes.
- Regularly reviewing and updating this policy to align with regulatory and industry changes.
- Strengthening collaboration with suppliers to address potential risks proactively.

This statement has been approved by the Leadership Team of Penta and has been signed for and behalf of Penta by Conall McDevitt, President.

Signed by:

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For any questions or further information, please contact our HR team.