

## 25 MODERN SLAVERY POLICY

### 25.1 DEFINITION OF MODERN SLAVERY

25.1.1 "Modern slavery" is a term which covers slavery (where ownership is exercised over a person); servitude (which involves the obligation to provide services imposed by coercion); forced or compulsory labour (which involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself voluntarily); and human trafficking (which concerns arranging or facilitating the travel of another with a view to exploiting them, even where the person consents to the travel).

25.1.2 We will ensure that we will comply with the Modern Slavery Act 2015 and are putting strict measures in place to ensure that modern slavery is not part of any of our business operations. This includes our supply chains, goods and services. This statement sets out the steps we are taking to continually develop our procedures and to check our compliance.

25.1.3 This document also serves as Sutton House Ltd's Annual Modern Slavery and Human Trafficking Statement, published in accordance with section 54(1) of the Modern Slavery Act 2015. It sets out the steps taken by Sutton House Ltd during the financial year ending 31 March 2025 to prevent modern slavery and human trafficking in our business operations and supply chains.

### 25.2 OVERVIEW

25.2.1 An overview of our organisational structure, key business activities and supply chains is as follows:

- Sutton House Limited is a specialist consultancy and training delivery provider operating in the security, defence and health sectors.
- Sutton House is owned by the holding company Ridgmont Holdings which owns and/or part owns multiple companies.
- The majority of Sutton House's business operations involve contracting trusted associates to contribute to niche project work advising clients (both UK government, foreign government and private enterprises and individuals) on risk mitigation measures, formulating specialist training packages, partnering with OEMs and recommending certain novel technologies.
- Occasionally Sutton House sources novel technologies on behalf of clients from UK-based suppliers. We carry out company checks on these suppliers before entering into any contract with them including requesting information about their supply chain and their company policies including with respect to Modern Slavery. The vast majority of these have supply chains in the UK and the USA. We assess that there is only one company for whom the supply chain is higher risk in China. In all cases these companies have existing supply contracts with the UK government (Department of Health and Social Care) which gives us confidence that the supply chain is assured, and ethical policies employed by the companies in question are robust.

25.2.2 We work closely with our main suppliers and customers; with our employees and their representatives to ensure the highest level of compliance with the laws of England and Wales. Our supply chain primarily comprises professional services providers, training and capability delivery partners, IT and cyber service suppliers, and facilities, travel, and logistical support providers. The majority of suppliers operate within the UK or other low-risk jurisdictions. Where overseas suppliers or partners are engaged, this is done on a controlled and risk-assessed basis.

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3.70	10/02/2027	Jason Rouse	Paul Westcott CEO

## 25.3 RESPONSIBILITIES

- 25.3.1 The CEO of Sutton House is responsible for overseeing our efforts to help to eliminate modern slavery and for monitoring progress against the KPIs contained in this document.
- 25.3.2 The Operations Director is responsible for ensuring that all recruitment and terms and conditions of employment comply with statutory requirements, and that any agencies used are appropriately checked and commit to ethical standards.
- 25.3.3 Managers are responsible for upholding our “core values” and for ensuring that employees who work for them also behave in accordance with these.
- 25.3.4 Our Finance Team are responsible for ensuring that appropriate checks are made prior to placing any orders with new suppliers, and that existing key suppliers are audited from time to time to ensure continued compliance.
- 25.3.5 All staff are responsible for identifying and reporting any concerns. Reporting can be to your Line Manager or through the Whistleblowing Policy if preferred

## 25.4 DOCUMENTATION

- 25.4.1 We have the following policies in place for employees:
- Code of conduct
  - Corporate social responsibility policy
  - Grievance procedure
  - Equal opportunity policy
  - Recruitment and selection policy
  - Whistleblowing policy
- 25.4.2 These are referenced in our employee handbook and applicable management systems (ISO 9001 and 27001) and copies are available from the compliance manager. All policies are reviewed annually, and we consult with managers and other interested parties prior to updating them.
- 25.4.3 Employees are reminded of the policies from time and time and notified of any updates.

## 25.5 RISK ASSESSMENTS

- 25.5.1 We consider that the main areas of risk of modern slavery within our business and supply chain are the trafficking of persons into the United Kingdom and take all possible steps to ensure all persons working for Sutton House or in our supply chain are Bone Fide. We employ:
- DBS checks
  - Seek input from at least two referees including previous employers
  - Request copies of driving licence and passport
  - Check DVLA records
  - Check bank account details for salary payments
  - Arrange UK Government vetting (at either SC or DV level) for all permanent staff
  - Check UK Government vetting records for all contractors

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25.5.2 Sutton House recognises that modern slavery risks vary depending on sector, geography, and service type. Lower-risk areas include UK-based professional consultancy and office-based services. Potentially higher-risk areas include the use of temporary or contingent labour, overseas training partners, and logistics or travel support in overseas environments. Risks are mitigated through robust recruitment checks, supplier due diligence, contractual safeguards, and clear escalation mechanisms. Modern slavery risk is reviewed periodically by senior management as part of the company's Management Review Meeting.

## 25.6 ACTIONS WE ARE TAKING

25.6.1 We have taken the following actions as part of our drive to eliminate modern slavery:

### 25.6.2 EMPLOYEES

25.6.3 We have a recruitment and selection policy to assist compliance with equal opportunity.

25.6.4 All new employees are recruited directly, and we confirm to the ethical standards set out by government. Right to work checks are conducted prior to joining as detailed above in 16.5.1. and all employees are employed on full time contracts which clearly inform them of the procedures that should be followed should they wish to leave our employment. In addition, we check identity documents such as passports and driving licences as well as qualification certificates.

### 25.6.5 AGENCY WORKERS

25.6.6 We do not use agency workers.

### 25.6.7 SUPPLIERS OF RAW MATERIALS

25.6.8 We do not purchase raw materials.

### 25.6.9 CUSTOMERS

25.6.10 We also work closely with our major customers to ensure optimum environmental friendliness and to ensure that our practices and procedures are in line with national standards. This statement is brought to the attention of our customers on request

## 25.7 DUE DILIGENCE, MONITORING AND AUDITING PROCESSES

25.7.1 All suppliers are issued with our Code of Conduct and are required to sign and return a commitment to ensuring that they take appropriate steps to ensure that their businesses and supply chains are free from modern slavery. prior to any orders being placed with them. We apply a proportionate, risk-based approach to due diligence. Enhanced due diligence is undertaken where services, geographies, or labour models present a higher potential modern slavery risk. Supplier compliance is reviewed periodically, particularly where the scope or location of services changes.

## 25.8 PENALTIES FOR BREACH

25.8.1 If a supplier is found to be involved in any form of modern slavery, its contract will be terminated either immediately or on its due renewal date, depending on the severity of the breach and we may also report any suspicions of criminal activity to the police.

25.8.2 If the breach is a minor one, we commit to helping that supplier by providing guidance and support for the affected workers.

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- 25.8.3 If it is established that any employee has acted in breach of any of our policies, or is aware of, has condoned or failed to report any suspicion of modern slavery within our business or supply chains, he/she will be subject to our disciplinary procedure.

## 25.9 TRAINING

- 25.9.1 We will provide suitable training for all employees to ensure that they are aware of this Statement and can be vigilant in identifying and reporting any concerns they have.
- 25.9.2 Employees and managers are informed of any updates to our policies on induction and by email as applicable.
- 25.9.2 Training is provided during induction and refreshed periodically thereafter. Relevant contractors and personnel involved in supplier engagement receive targeted awareness appropriate to their role.

## 25.10 EFFECTIVENESS AND KEY PERFORMANCE INDICATORS

- 25.10.1 The effectiveness of Sutton House Ltd's approach to preventing modern slavery and human trafficking is measured using the following Key Performance Indicators (KPIs):
- 100% of employees and relevant contractors complete modern slavery awareness training
  - Zero confirmed incidents of modern slavery or human trafficking within Sutton House Ltd's operations or supply chains
  - Annual review of this policy and associated risk assessment by senior management
- 25.10.2 All KPIs are formally tracked, reviewed, and evidenced through the Management Review Meeting process, in line with Sutton House's ISO 9001 and ISO 27001 management systems.

Signed



Name: Paul Westcott MBE

Position: CEO

Date: 10<sup>th</sup> February 2026

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