

## Anti-Bribery & Modern Slavery Statements

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Document Ref:	Anti-Bribery & Modern Slavery Statement
Version:	2
Date of Version:	25/03/2025
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Approved By:	Anesh Dayaram
Confidentiality Level:	Controlled: Uncontrolled if printed

## Amendment History

This document is reviewed periodically, at least annually, and is retained for a period of 5 years. Amendments and revisions are distributed to the named holders. The history of amendments and the issue of revisions are recorded below.

Date	Amend. No.	Page No.	New Issue No.	Reason for Change	Authorised By
01/12/2023	-	All	1	Initial release.	Anesh Dayaram
25/03/2025	1	All	2	Expanded Modern Slavery section; clarified supply chain due diligence and reporting; simplified structure; reworded bribery controls.	Anesh Dayaram
	2		3		
	3		4		
	4		5		
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	6		7		
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## Introduction

Arum Systems Limited is committed to conducting its business ethically, with integrity and transparency. We operate a zero-tolerance policy toward bribery, corruption, slavery, and human trafficking in all forms. This statement outlines the steps we take to prevent these practices within our business and our supply chain.

## Anti-Bribery and Corruption Policy

Arum Systems Limited complies with the UK Bribery Act 2010 and enforces strict rules to prevent bribery or corruption in any part of its operations.

We do not:

- Offer, promise, give, request, or accept bribes, kickbacks, or any improper payments.
- Allow facilitation payments or unofficial payments to gain commercial advantage.
- Permit employees to accept gifts or hospitality that could be seen to influence decision-making.

We do:

- Maintain accurate records of all business-related expenditures and payments.
- Conduct due diligence on third parties, particularly in higher-risk jurisdictions or industries.
- Train relevant staff to recognize and avoid bribery risks.
- Require all gifts and hospitality to be recorded and, where necessary, approved in advance.

Any concerns about potential bribery or corruption must be reported to a line manager or via our internal whistleblowing channels.

## **Modern Slavery and Human Trafficking**

Although Arum Systems Limited is not legally required to publish a modern slavery statement under Section 54 of the Modern Slavery Act 2015, we are committed to identifying and mitigating the risks of modern slavery and human trafficking within our business and supply chains.

### **Our Business and Supply Chain**

Arum Systems provides specialist technology services and solutions. Our supply chains include IT hardware providers, software vendors, consultants, and professional service firms, both in the UK and internationally.

### **Our Commitment**

We uphold the following principles:

- Zero tolerance for slavery, servitude, forced or compulsory labour, or human trafficking.
- Engaging with suppliers who share our values and commitment to ethical practices.
- Taking steps to understand and address modern slavery risks, especially in outsourced and overseas arrangements.

### **Risk Assessment and Due Diligence**

We undertake risk-based due diligence when onboarding suppliers, with a focus on:

- Country and sector risk (e.g., high-risk geographies or industries with low-wage labour).
- Transparency in supplier relationships and contractual obligations.
- Suppliers may be required to confirm adherence to anti-slavery laws and provide evidence of ethical sourcing or labour practices.

### **Training and Awareness**

We provide training to relevant employees to help them identify signs of modern slavery and understand their role in preventing it.

## **Reporting and Accountability**

Any concerns related to modern slavery should be reported to a manager or through our whistleblowing channels. We are committed to investigating all concerns thoroughly and confidentially.

## **Review and Approval**

This policy is reviewed annually to ensure its effectiveness. It has been approved by senior management and reflects the company's ongoing commitment to ethical conduct.

Signed by

*Anesh Dayaram*

Anesh Dayaram  
**Information Security Officer**