Halo Benefits

POLICY

Modern Slavery and Human Trafficking Statement

The steps we take to prevent modern slavery in our business.

UPDATED	VERSION	NEXT REVIEW
23 November 2026	2.0	November 2027

Halo Benefits Ltd · Owner: Dionne Clarke, Head of People & Partnerships · Classification: Internal & Public

Document control

Policy owner	Dionne Clarke, Head of People & Partnerships
Approved by	Board of Directors
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Review frequency	Annually
Applies to	Halo Benefits Ltd, its people and its supply chain
Related policies	Code of Conduct and Business Ethics, Whistleblowing Policy, Supplier Code of Conduct

Version history

Version	Date	Summary of changes	Author
1.0	30 Oct 2026	First issue	Dionne Clarke
2.0	23 Nov 2026	Rebranded and restructured for clarity and readability	Dionne Clarke

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1. Purpose of this statement

This statement sets out the steps Halo Benefits Ltd is taking to understand and reduce the risk of modern slavery and human trafficking in our own operations and our supply chain, for the financial year ending in 2027.

Our turnover is below the £36 million threshold in section 54 of the Modern Slavery Act 2015, so we are not legally required to publish a statement. We publish this one voluntarily because our customers and partners reasonably expect it, and because we want good practice built in from the start. We aim to describe honestly what we do now and what we plan to do.

2. Our business

This statement covers **Halo Benefits Ltd** (company number 17577358), which provides the Halo Benefits flexible benefits platform: software that employers use to run their employee benefits.

We are a small, remote-first company with fewer than 50 people. We do not manufacture goods, run a vehicle fleet or operate warehouses, and our systems are hosted with cloud providers.

3. Our supply chain

Our supply chain is short and mainly digital. The main categories are:

Category	Examples	Our view of the risk
Cloud hosting and software	Large cloud platforms and software tools	Low direct risk, though hardware manufacturing further up the chain carries known risk
IT hardware	Laptops, monitors and accessories	Medium, as electronics supply chains have documented forced-labour risk
Professional services	Legal, accounting, insurance and consultants	Low
Facilities	Serviced office, including cleaning and security	Medium, as cleaning and security are recognised higher-risk sectors
Contractors and freelancers	Software development and design	Low to medium, depending on location and how they are engaged

4. Our own workforce

All of our employees are paid at least the Real Living Wage, as set by the Living Wage Foundation. Right-to-work checks are carried out for every employee before they start. We never charge workers recruitment fees, hold their identity documents or restrict their freedom of movement.

5. Our policies

This statement is supported by our Code of Conduct and Business Ethics, Whistleblowing Policy, Anti-Bribery and Corruption Policy, Equality, Diversity and Inclusion Policy and Supplier Code of Conduct. Our Supplier Code of Conduct sets out our expectations on forced and child labour, fair pay and working hours, and gives us the right to request information and to audit.

6. Checking our suppliers

Our approach is proportionate to our size. During the year we will:

- keep a supplier register recording each supplier's category and location, and give each one a modern slavery risk rating based on its sector and country;
- ask new suppliers rated medium risk or higher to accept our Supplier Code of Conduct, and request their own modern slavery statements where they publish one;
- buy IT hardware from established manufacturers and resellers that publish modern slavery statements, and choose refurbished equipment where suitable;
- confirm with our serviced office provider how cleaning and security staff are employed and paid; and
- include modern slavery and ethical conduct clauses in new supplier and contractor agreements.

We have not commissioned independent audits of suppliers, and we do not currently claim any certification relating to labour standards.

7. Training

All staff complete short modern slavery awareness training when they join and every year, covering the signs of exploitation and how to report concerns. Staff who buy goods or services on our behalf receive additional guidance relevant to their role.

8. Measuring progress

We will measure and report on the following in our next statement:

Measure	Target for the year
Staff completing modern slavery awareness training	100% of staff
Active suppliers with a risk rating	100%
Medium or higher risk suppliers that have accepted our Supplier Code of Conduct	100% of new suppliers and 80% of existing suppliers
Employees paid at least the Real Living Wage	100%
Modern slavery concerns reported	All investigated and recorded

9. Roles and responsibilities

- **Board of Directors:** approves this statement and oversees progress against our targets.
- **Designated director:** a named director coordinates supplier checks and handles any concerns.
- **Anyone buying on our behalf:** follows our supplier onboarding steps and escalates any concerns.
- **Everyone:** completes training and reports any concern.

10. Reporting concerns

Anyone with a concern about modern slavery in our business or supply chain should report it to **compliance@halobenefits.co.uk** or through our Whistleblowing Policy. Concerns can also be reported to the Modern Slavery and Exploitation Helpline or, in an emergency, to the police on 999.

If we identify exploitation in our supply chain, our first priority will be the welfare of the people affected. We will work with the supplier to put things right where appropriate, and will end the relationship where it is not.

11. Review and approval

This statement is reviewed and updated every year. It was approved by the Board of Directors of Halo Benefits Ltd.

Signed: _____ [Director name], Director, for and on behalf of Halo Benefits Ltd

Date: 23 November 2026

QUESTIONS ABOUT THIS POLICY?

Contact Dionne Clarke, Head of People & Partnerships, at dionne@halobenefits.co.uk.