

Document type: policy and minimum requirements (PMR)

# Modern slavery and human trafficking.

Governance, risk, and compliance (GRC)

Published regulatory statement



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## Document control

The version of this document cancels and replaces the previous version, which should be removed from circulation.

## Document information

Item	Information
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## Document authorisation

Approval	Role	Name
Approver	Group CEO	John Petter
Reviewer(s)	Company Secretary	Chris Fox
	Director of Risk and Compliance	Neville Cotton
Process Owner and Author	Director of Risk and Compliance	Neville Cotton

## Document history

Version	Description	Date
1	Annual statement established.	07 Aug 2019
2	Annual statement enhancements under Zellis brand.	08 Aug 2020
3	Rewrite of the annual statement with substantial enhancements. Cancels and replaces all previous versions. Shifting to new version and document control structure. Submission to the Home Office public register. Review of statement with amends by Alistair Scott, alignment to brand and tone, and optimisation for website publication.	06 Aug 2021
4	Annual statement update incorporating performance outcomes over the past 12 months	05 Aug 2022
5	Annual statement update and transfer to new branded group template	03 Aug 2023
6	Reviewed and updated for FY2024 statement and disclosure.	05 Aug 2024
7	Reviewed and updated for FY2025 statement and disclosure.	28 Aug 2025

# References

## External references

The modern slavery and human trafficking statement is documented in compliance with the following principal international standards and regulatory requirements.

Reference	Title
UNTOC	United Nations Convention against Transnational Organised Crime (UNTOC)
UNCAC	United Nations Convention Against Corruption (UNAC)
FATF	Financial Action Task Force, predicate offences and recommendations applicable to modern slavery and human trafficking
UNGC	United Nations Global Compact
ILO	International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights of Work
POCA2002	Proceeds of Crime Act 2002
MLR2017	The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
s54(1)	The Modern Slavery Act 2015
Human Trafficking Act 2013 (Ireland)	Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013
Articles 23-24	The Constitution of India
Article 24	The Bonded Labour System (Abolition) Act, 1976, India
Child Labour Regulation	Child Labour (Prohibition and Regulation) Act, 1986, India
Article II. Declaration of Principles and State Policies, section 1, 3, 6, 18	Philippines Constitution 1987

Reference	Title
Government registry	<p>Home Office, public register of Modern Slavery and Human Trafficking Statement. Guidance on statements: transparency on indicators of modern slavery applicable to the business, prioritisation of activity where we can make a difference, demonstrate progress against targets on:</p> <ul style="list-style-type: none"> <li>• Structure</li> <li>• Supply chains</li> <li>• Policy</li> <li>• Due diligence processes</li> <li>• Risk assessment</li> <li>• Measuring effectiveness</li> <li>• Training</li> </ul>
FRC Corporate Code	Wates Corporate Governance Principles for Large Private Limited Companies

## Associated internal documents

The associated internal documents should be read, reviewed, and updated whenever there is a change to the Modern Slavery and Human Trafficking Statement

Document Reference	Name of Document
Primary Framework	FWK0008 Economic Crimes
Supporting Frameworks	FWK0002 Corporate Governance FWK0003 Enterprise Risk Management Framework
Primary Policy and Minimum Requirements	Modern Slavery and Human Trafficking
Supporting Policies and Minimum Requirements	PMR Code of Conduct and Ethics PMR Anti-Money Laundering PMR Anti-Bribery and Corruption PMR Economic Crime Prevention PMR Sustainable Procurement PMR Supplier Assurance PMR Speak Up and Whistleblowing PMR Supplier Code of Conduct and Ethics
Statutory and Regulatory Training Content	Annual Compliance Training – Modern Slavery and Human Trafficking
Reporting	Annual Report and Accounts

## Terms and definitions

Terms and definitions defined by the internationally recognised standards which our frameworks align are applied throughout our documentation.

Refer to the independent list of terms and definitions within the *GRC Manual*.

## Scope

The scope of the Modern Slavery and Human Trafficking Statement is applicable to the Zellis Group of Companies (Zellis Group) which includes:

Zellis Holdings Limited		
Zellis	Moorepay	Benifex
Zellis UK Limited	Moorepay Limited	Benifex Limited
Zellis Ireland Limited	Moorepay Compliance Services Limited	Benifex Financial Solutions Limited
Zellis HR India Private Limited	Natural HR Limited	Benifex Payments Limited
Elementsuite Limited	Moorepay Ireland Limited	Benifex Philippines Inc
		Wrkit Limited
		Cloud 8 Limited

## Zellis Group modern slavery and human trafficking statement

Zellis Group has reviewed its obligations and the steps taken in the past financial year, sustaining the best possible governance and oversight provisions to detect signs and prevent modern slavery or human trafficking anywhere in our supply chain and services provisions.

Our statement is made in accordance with section 54 of the *Modern Slavery Act, 2015* and is the seventh statement of publication. Our commitment to our customers, stakeholders, and the wider community is clear, and we look forward to the ongoing enhancements improving our practices for the betterment of our business and society.

### About Zellis Group

As the leading provider of payroll and HR solutions for UK and Ireland-based organisations, Zellis Group delivers a range of specialist products and services through its three core brands: Zellis, Benifex and Moorepay. In total, Zellis Group currently has a team of circa 3,200 expert employees across the UK, Ireland, Sweden and India.

Each month, 5 million employees across the UK and Ireland are paid through Zellis solutions. Zellis provides award-winning payroll and human capital management (HCM) software in the form of its flagship product, Zellis HCM AIR. It is also the trusted managed services partner to more than 120

customers, delivering complex payroll, HR, background checking, and consultancy requirements from dedicated service centres across three geographies.

During this financial year Zellis acquired Elementsuite who are an AI enabled HR software company. As part of the transaction, Elementsuite will be combined with Zellis, creating an end-to-end AI-powered HR and payroll platform.

Founded in 1966, Moorepay provides payroll and HR solutions to small and medium-sized organisations in the UK and Ireland. With over 500 qualified staff, the company delivers its own distinct software and managed service offerings, tailored to the needs of SMEs. Its specialisms include employment law consultancy and health and safety services among others.

Benifex is Zellis Group's specialist in employee benefits, reward, recognition, and communications. In February 2025 Benefex and Benify officially merge to one company Benifex – a company with a singular purpose: to improve the lives of millions of employees by building remarkable experiences that people love. Benifex supports nearly 5 million employees in 3000 global organisations across the UK, USA, Europe, and South-East Asia. Benifex's OneHub platform enables customers to design, manage, and deliver meaningful employee experiences, from benefits and communications to recognition and wellbeing, all in one place.

## Our policy and ongoing commitment

The Zellis Group of companies takes the ongoing issue of modern slavery, human trafficking, forced and bonded labour very seriously and is committed to the global effort to combat it. We continue to ensure our products, services, and employment practices, and those of our customers, uphold these principles.

We are totally aware of the potential risks emerging from the abuse of services facilitating the processing of salary payments and employment benefits which, if penetrated by 'bad actors', can be deployed for the purposes of modern slavery including forced labour, child labour, illegal restraint, human trafficking, migrant smuggling, and extortion. We are conscious of our duty to detect, prevent, and report the associated predicate offences of corruption, bribery, and theft of a victim's wage or employment benefits, and understand that this demonstrates our commitment to the elimination of humanitarian offences, money laundering, and other types of financial crime.

We have extended the scope of our frameworks, policies, principles, and code of practice to ensure our supply chain subscribes to our rigorous standards. We encourage commitment to the *Financial Action Task Force (FATF) Recommendations*, the *International Labour Organisation's Declaration on Fundamental Principles and Rights of Work*, and the *United Nations Convention Against Corruption*. To further our commitment in societal matters of this nature, Zellis Group subscribed to the *United Nations Global Compact (UNGC)*. This has formalised our position on employment rights.

We don't employ children, nor do we confiscate employee identification documents. We don't permit compulsory overtime, nor do we allow worker-paid recruitment fees, as we deem this to be bribery and corruption.

We uphold people rights to have the freedom to terminate their employment with us, enjoy freedom of movement, and freedom of association. We therefore do not prevent any employee from joining any trade union. Working practices are also designed with the welfare of our employees in mind, by ensuring their physical, mental, and emotional wellbeing is maintained and free from any threats of violence, harassment, and intimidation. We prohibit all forms of discrimination and promote equity, diversity, and inclusion within the workplace because everyone matters.

## Risk assessment

Zellis Group operates group wide enterprise risk management practices with localised and group-level reporting routes governed by an enterprise risk management system consisting of a framework, policy, and standard operating procedures. We apply a 'principles and outcomes' approach to the way we manage all types of risk. Both the corporate governance and enterprise risk management frameworks are matters reserved for the Zellis Holdings Board and are reviewed annually for adequacy. All our management systems integrate with each other within our group *GRC Manual*, forming a dynamic suite of collateral which humanises rules so that people naturally adopt the right behaviours and remain vigilant in detecting signs of modern slavery and human trafficking.

Within our economic crimes management system, our economic crimes framework is the primary document where modern slavery and human trafficking preventive measures are governed and managed. Due to its regulatory nature, we adopt a risk-based approach in the way we operationalise requirements. Modern slavery and human trafficking can be very hard to detect, especially when efforts are being made to hide this type of criminal and unethical activity. We proactively acknowledge emerging threats and adapt our controls environment to keep pace with new threats and trends through formalised, documented enterprise risk management processes.

We are fully aware of how to recognise signs of modern slavery and human trafficking through our internal controls, which would trigger further investigation if activity is suspected or identified. Our systems and controls ecosystem is under continual development, with collaboration between the skilled teams delivering our services and those maintaining compliance oversight and independent assurance over our supply chain.

## Due diligence

We have reviewed the adequacy of our governance structure in accordance with our document management processes and are satisfied our commitment, policy, and operational provisions meet requirements.

We have continued to develop our education and awareness programme, aligning the messaging to the specific nature of our business, as well as highlighting the extent of the global exposure and the volume of victims in modern slavery. Whilst the risk exposures are low due to the nature of our business and core services, we are committed to making sure our employees stay alert and know what to do, should they identify any suspicious activity.

Our control objectives are mapped against enterprise risks and designed to classify the control type, outline the purpose of the control and why it exists. We also define how to perform the control to ensure signs of modern slavery and human trafficking are detected, prevented, and reported. We continue raising awareness within the wider community through internal campaigns to maintain a reasonable level of vigilance.

## Our performance

Last year, we enhanced our visibility of the profiling of our supply chain through our supplier assurance programme. Technological advancements remain a focus area as we continue developing the skillsets needed to enable data flow mapping. The output will create dynamic analytics and rich data sets providing insights and intelligence whilst enhancing our reporting capabilities. We continued developing our scenario-based training modules and our employees remain engaged and committed to the fulfilment of our policy and to the wider cause.



## Modern slavery and human trafficking reporting metrics

We have integrated internal controls into our controls environment and established the reporting metrics into our financial crimes framework. We have also incorporated modern slavery reporting metrics into the *MLRO Annual Report* received by Zellis Group board audit and risk sub-committee.

## Supply chain management enhancements

During the reporting period we conducted supplier assurance in accordance with our planned schedule. Our Supplier assurance programme incorporates assessments on modern slavery and human trafficking and child labour risk exposures. We have developed the blueprint of our supply chain to understand where we may have modern slavery, human trafficking, and child labour vulnerabilities. We confirm that we have selected suppliers to lower such risk exposures and have no concerns to report. If any form of modern slavery is identified within our supply chain we would set clear requirements to provide appropriate safeguards, and establish clear reporting routes for ongoing monitoring. If necessary, we would also invoke the right to arrange for social auditing.

## Next steps

We will continue developing and enhancing our education and awareness campaigning to create a more proactive stance towards the identification, prevention and reporting of modern slavery and human trafficking cases.

- Continue humanising our education campaign heightening colleague awareness on the magnitude and scale of the global issue.
- Promote control design opportunities within core products to detect and prevent modern slavery.
- Incorporate the identification and evaluate the adequacy of our provisions within our internal audit programme.

## Timeline of events

Reporting Period	Description
FY2024 – 2025	Our policy and performance outcomes were reviewed, updated and reported, incorporating our commitments for the next financial year. A new screening platform has been put in place to support assessing risk in our customers and supply chain for the group. As the group grows through natural growth and acquisition, we will continue to stay vigilant, continuing to develop best practices against this crime.
FY2023-2024	Our policy and performance outcomes were reviewed, updated and reported. We incorporated next steps for the next financial year. We continue developing best practices and play our part in combatting against this global and domestic problem.
FY2022-2023	Our policy and performance outcomes were reviewed, updated, and reported, incorporating our commitments for the next financial year. We continue developing our digital supply chain mapping. We subscribed to the UN Global Compact and enhanced our financial crime prevention provisions as well as our people policies.

Reporting Period	Description
FY2021-2022	Our policy and commitments adjusted, and we updated our performance outcomes towards the commitments made last year, as well as confirming our commitments for the next financial year.
FY2020-2021	Aligned our modern slavery and human trafficking statement to FATF recommendations, ILO, and UNCAC. Enhanced training to align with identifying signs of modern slavery and human trafficking through our internal control system. Increased awareness on reporting suspicious activity.
FY2019-2020	Modern slavery and human trafficking statement enhanced
FY2018-2019	Modern slavery and human trafficking statement established and published

John Petter, Group Chief Executive Officer

Zellis Holdings Ltd

