

Modern Slavery and Human Trafficking Statement

Our Commitment to Responsible Business

Version	1.0		
Effective Date	May 2026	Next Review	May 2027
Owner	COO	Approved By	Board of Directors

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps QED has taken, and intends to take, to ensure that modern slavery and human trafficking are not taking place in our business or supply chains.

1. About QED

- 1.1. QED Ltd is a software development and AI technology company with entities in Croatia, Serbia and the UK. We design and build bespoke software, data solutions, and AI products for clients across various sectors.
- 1.2. Our workforce consists of employees, contractors, and interns based primarily in the UK, Croatia, and Serbia.
- 1.3. Our direct exposure is assessed as low given the nature of our work, but risks exist in our broader supply chain and we remain vigilant.

2. Our Supply Chain

QED's supply chain is relatively simple and predominantly consists of:

- Technology vendors and SaaS providers (e.g., cloud infrastructure, development tools, HR systems)
- Professional services firms (legal, accountancy, HR)
- Freelance contractors and sub-contractors in the technology sector
- Our highest risk categories are assessed as:
 - hardware procurement (potential conflict minerals / manufacturing conditions)
 - offshore development sub-contracting

3. Policies in Relation to Slavery and Human Trafficking

QED maintains the following policies relevant to preventing modern slavery:

- This *Modern Slavery Statement*
- *ESG Policy* (including supply chain ethics and ethical client selection)
- *General Data Protection Policy*
- *Employee Privacy Notice*
- *Code of Conduct* (included in Employee Handbook)
- *Whistleblowing Policy*

All employees are required to read and acknowledge our Code of Conduct, which explicitly prohibits participation in or facilitation of modern slavery, forced labour, child labour, or human trafficking in any form.

4. Due Diligence Processes

To identify and address risks of modern slavery and human trafficking, QED takes the following steps:

4.1. Employment Practices

- 4.1.1. All employees and contractors are engaged through written contracts at or above the applicable national minimum wage (UK National Minimum Wage / National Living Wage; Croatian and Serbian statutory minimums).
- 4.1.2. Right-to-work checks are conducted for all employees before commencement of employment.

4.1.3. We do not charge fees to workers for employment, accommodation, or equipment.

4.1.4. We do not hold workers' identity documents.

4.2. Supply Chain

We prefer suppliers with published Modern Slavery Statements or equivalent commitments.

4.3. Reporting and Concerns

4.3.1. Any employee, contractor, or third party who suspects modern slavery or human trafficking in connection with QED's business or supply chain should report it immediately to the COO at compliance@qedcode.io.

4.3.2. Reports can also be made to the relevant authorities: the *Modern Slavery Helpline* (UK: 08000 121 700) or the *National Crime Agency*.

5. Training

Awareness training is provided to senior leadership. All staff are directed to report any concerns to the COO.

6. Policy Review

This policy is reviewed annually by the COO - and, where applicable, at Board level -and updated in response to changes in law, regulatory guidance, or business operations. Material changes are communicated to all staff.