OCTOBER 2026 · APPROVED ISSUE

Modern Slavery and Human Trafficking Statement

Policy commitments and supply-chain approach

Organisation	UnifAI Technology Limited · Company no. 12301340
Version	2026.2
Owner	Chief Executive Officer
Approved by	Dan Byles, Chief Executive Officer
Effective date	29 October 2026
Next review	29 October 2027, or sooner after a material change
Contact	info@unifaitechnology.com

1. Our commitment and scope

UnifAI Technology Limited opposes slavery, servitude, forced or compulsory labour, trafficking and exploitation in its operations and supply chain. This statement sets out the standards we require and the measures through which we will identify, address and report risks.

It applies to directors, employees, contractors acting for UnifAI and suppliers providing goods or services to us. It covers recruitment, purchasing, project delivery and subcontracting, including work undertaken outside the UK. A supplier's location, size or relationship with a well-known brand does not remove the need to consider risk.

This is a voluntary statement of policy and operating commitments. Annual reporting must distinguish completed, evidenced activity from planned action and identify the relevant reporting period.

2. Our business and supply chain

UnifAI is a UK AI and data-software company, with team members in the UK and Portugal and applications in healthcare, environmental monitoring and infrastructure. Relevant purchases include cloud and software services, IT equipment, professional services and, where projects require them, sensors, deployment support and laboratory services.

Our assessment will consider both direct suppliers and significant subcontracting or manufacturing dependencies. Particular attention will be given to hardware production, recruitment intermediaries, outsourced labour and services involving workers with limited bargaining power.

3. Minimum labour standards

- Employment must be freely chosen. Workers must be able to leave employment on lawful, reasonable notice and must not face coercion, threats, debt bondage or restriction of movement.
- Workers must not pay recruitment fees to obtain work. Identity documents must not be withheld to prevent workers leaving, and wages must not be unlawfully withheld or deducted.
- Suppliers must respect applicable minimum-age requirements, protect young workers from hazardous work, and provide understandable terms, lawful pay, rest and safe working conditions.
- Discrimination, harassment, intimidation and retaliation for raising concerns are prohibited. Workers must be able to exercise lawful rights of association and representation.

4. Risk-based supplier due diligence

The colleague responsible for a purchase must identify the supplier, the service or goods, relevant locations and material subcontracting. The assessment must consider sector, country, recruitment practices, workforce vulnerabilities, contract value and the consequences of disruption or harm.

Lower-risk suppliers may be assessed using public information and contractual assurances. Higher-risk suppliers require targeted questions and supporting evidence, such as labour policies, recruitment arrangements, relevant audit findings and corrective actions. Audit certificates alone are not conclusive evidence that exploitation is absent.

The Supplier Code of Conduct should be incorporated into new or renewed arrangements where proportionate and practicable. Equivalent supplier standards may be accepted following review. Where our leverage is limited, the decision and the alternative controls must be recorded. Unacceptable unresolved risks must be escalated to a director before a commitment is made.

Assessments must be revisited following a significant change, a credible allegation or evidence of poor practice, and within the risk-based review cycle recorded for that supplier.

5. Reporting concerns and responding to harm

Employees and suppliers should report concerns promptly to their UnifAI contact or to info@unifaitechnology.com, marking the message for the Chief Executive Officer. A concern involving that person should be raised directly with another director. The general mailbox is not an anonymous or independent reporting service; a reporter may request an alternative confidential conversation.

Information will be restricted to those who need it for a fair investigation, subject to legal and safeguarding requirements. No person should suffer retaliation for reporting a genuine concern or assisting an investigation. This policy does not restrict lawful reporting to authorities or protected disclosures.

Immediate danger requires contact with the appropriate emergency service. Staff should not confront a suspected trafficker or take steps that could increase risk to a worker. A director will arrange a proportionate assessment, seek specialist advice where necessary, preserve relevant evidence and consider reporting or referral to appropriate authorities.

Remediation should prioritise affected people. Depending on the case, this may include repayment of recruitment fees, restoration of wages or documents, safer working arrangements and monitored corrective action. Suspending or ending a relationship may be necessary, but must be considered alongside the potential consequences for workers and our contractual and legal obligations.

6. Training, records and accountability

The Chief Executive Officer is responsible for implementation, with Board oversight. Colleagues involved in recruitment, procurement or supplier management must receive guidance appropriate to their responsibilities, including how to recognise warning signs and escalate concerns. Training completion and any supplier checks must be recorded rather than assumed.

The annual management review will examine supplier-risk coverage, acceptance of standards or equivalent controls, relevant staff training, concerns raised and the progress of corrective actions. Any published figures must identify their reporting period, denominator and evidence. A lack of reported concerns will not be represented as proof that no exploitation exists.

7. Annual review and publication

The Board will review the statement and implementation evidence annually. It will reassess whether the statutory reporting criteria apply, including relevant group turnover and operations. Where an annual statement under section 54 of the Modern Slavery Act 2015 is required, it must cover the relevant financial year, describe the steps actually taken, be approved by the Board, signed by a director and made accessible through a prominent homepage link.

Reference framework

Modern Slavery Act 2015, section 54

Home Office: Transparency in supply chains, updated December 2025