

Modern Slavery Statement

Organisation: Oxford Integrated Systems Ltd

Reporting period: 31 March 2025 – 1 April 2025

Date of approval: 31 March 2024

Approved by: Dr John McCarthy CEO

1) Our business and supply chain

- Structure & operations: UK Business 2 employees
- Supply chain: [Tier-1 profile, key categories, countries of origin, use of labour agencies]
- Subsidiaries & joint ventures: N/A

2) Policies and governance

- Policies: Modern Slavery & Human Trafficking Policy; Code of Conduct; Supplier Code; Recruitment Policy; Speak-Up/Whistleblowing; Grievance & Remediation.
- Governance: [Committee/Board] oversees the programme; Executive sponsor: [Name].
- Accountability: Day-to-day ownership sits with [Compliance/TPRM/Procurement].

3) Risk assessment

- Approach: Annual enterprise and supplier-level risk screening using factors such as country/sector risk, worker type (migrant/agency), spend, and past findings.
- High-risk areas this period: [Countries, categories, labour models].
- Method: Desktop screening (all suppliers) and risk-based deep dives (EDD) for high/very-high risk.

4) Due diligence

- Onboarding: KYC/beneficial ownership verification; contractual anti-slavery clauses; right-to-audit and worker-voice requirements.
- Monitoring: Risk-based audits (announced/unannounced); worker interviews; payroll and recruitment cost checks; grievance channel review.
- Escalation: Allegations triaged via case management; corrective action plans (CAP) with time-bound closure and evidence; remediation provided where harm is identified (e.g., fee repayment, contract correction, safe exit).

5) Training and awareness

- Employees: Mandatory annual training for in-scope roles (Procurement, HR, Operations, Site Leads). Induction for new starters.
- Suppliers: Targeted training for high-risk suppliers; access to multilingual resources; manager toolkits.

6) Measuring effectiveness (KPIs)

- Policy coverage: % of in-scope entities/sites with approved policy (target 100%).
- Risk screening coverage: % of active suppliers screened in last 12 months ($\geq 90\%$).
- EDD completion: % of high/very-high risk suppliers with EDD completed (100%).
- Audit execution: % of planned audits at high-risk sites completed ($\geq 95\%$).
- CAP on-time: % of CAP actions closed by due date ($\geq 90\%$).
- Worker-voice access: % of supplier sites with anonymous reporting channels ($\geq 85\%$).
- Training completion: Employees $\geq 95\%$; targeted supplier learners $\geq 80\%$ (year 1).
- Time-to-protect: Median hours from allegation to safeguarding action ($\leq 24\text{h}$).

(Add prior-year performance and commentary on trends.)

7) Supplier and partner expectations

Compliance with our Supplier Code of Conduct; prohibition of recruitment fees; no document retention; accurate wages and hours; access to grievance channels; cooperation with audits and worker interviews; timely remediation.

8) Remediation

We are committed to providing effective remedy in line with the UN Guiding Principles, including repayment of any recruitment fees, restoration of documents, contract correction, and safe return/transition where appropriate. We track remediation to completion and verify with evidence.

9) Future commitments (next reporting period)

[e.g., Extend worker-voice to Tier-2 in top 3 categories; complete EDD on all very-high risk sites; integrate migration agent mapping; publish supplier list for top categories.]

10) Approval

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and constitutes the modern slavery statement for the financial year [Reporting period] for [Company].

Signed for and on behalf of [Company]: 

Name: John McCarthy

Title: CEO

Date: 1 April 2025