



# **Modern Slavery and Human Trafficking Policy Statement**



# Document Control

**Responsibilities:**

Role	Responsibility
GRC	Owner, Reviewer
Director	Approver

**Review and Approval:**

Version	Date	Location	Summary
1.0	30/06/2016	SharePoint Company Policies	Initial Issue
1.1	30/07/2016	SharePoint Company Policies	Updated, Approved
1.1	05/01/2018	SharePoint Company Policies	Approved
1.2	23/03/2018	SharePoint Company Policies	Updated, Approved
1.2	04/01/2019	SharePoint Company Policies	Approved
1.2	03/01/2020	SharePoint Company Policies	Approved
1.3	03/04/2020	SharePoint Company Policies	Updated, Approved
1.3	08/01/2021	SharePoint Company Policies	Approved
1.4	04/05/2021	SharePoint Company Policies	Rebrand, Approved
1.5	16/06/2021	SharePoint Company Policies	Updated, Approved
1.5	07/01/2022	SharePoint Company Policies	Approved
1.6	31/12/2023	SharePoint Company Policies	Updated, Approved
1.7	31/08/2024	SharePoint Company Policies	Updated, Approved
1.7	07/01/2025	SharePoint Company Policies	Approved
1.8	19/01/2026	SharePoint Company Policies	Updated, Approved



# Modern Slavery and Human Trafficking Policy Statement

## For accounts ending 31 December 2025

We are committed to eliminating acts of modern-day slavery and human trafficking within our business and from within our supply chains. Although we have no legal obligation to report on slavery and human trafficking, this statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and is produced accordingly as soon as possible after the relevant year-end.

### Organisational Structure, Business and Supply Chains

We are a global provider of cloud-based spend management solutions. Founded in 2001, Medius is majority owned by the global investment firm Marlin Equity Partners. In 2019 Medius acquired the UK entity Wax Digital. The group has offices in Sweden (HQ), the United States, the United Kingdom, Australia, Denmark, Norway, the Netherlands, France, Tunisia and Poland. Our supply chains are all wholesale or retail suppliers of infrastructure, equipment, labour and materials relating to software production and office administration. The vast majority of our suppliers are headquartered in low-risk countries.

### Policy on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains. This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our supply chains.

### Due Diligence

Although we consider ourselves to be a 'low risk' business with regard to slavery and human trafficking, we foster a culture that encourages the identification and reporting of any such risks within our business. We regularly audit our suppliers and such audits have not outlined any areas with higher risk than others.

### Assessing and Managing Risk

As part of our efforts to identify and mitigate risks within our supply chain, we operate systems to identify, assess and monitor risk areas. We expect our suppliers to operate in compliance with all applicable laws and regulations, allow their workers freedom of association, movement and to terminate their employments. Also, our suppliers are prohibited from exposing their workers to threat of violence, harassment and intimidation, using worker-paid recruitment fees, compulsory overtime, child labour, discrimination and confiscation of workers original identification documents. We also expect our suppliers to provide access to remedy, compensation and justice for victims of modern slavery.



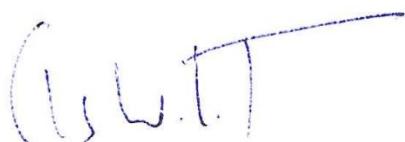
## Effectiveness in Combating Slavery and Human Trafficking

We have zero tolerance to slavery and human trafficking. To ensure that all those in our supply chains comply with our values, we are putting in place a supply chain compliance program. We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains: a) key suppliers are regularly audited b) monitor any slavery and human trafficking cases coming to our attention via our whistleblower system or through other channels.

## Training

We provide appropriate training to ensure that relevant employees understand the risks of modern slavery and human trafficking within our business and supply chains.

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Chris Wilmot  
CFO and Director  
Medius Software Limited

