

THALAMOS LIMITED

# Modern Slavery and Human Trafficking Statement

Date	20 <sup>th</sup> January 2026
Version	2.0
Author	James Macaulay
Approved by	Ross Tomison
Classification	Public

# Policy Statement

This modern slavery and human trafficking policy relates to all our actions and activities during financial year 1 April 2025 to 31 March 2026

Pursuant to Section 54 of the Modern Slavery Act 2015. This statement sets out our commitment to prevent slavery and human trafficking in respect of all our business relationships and activities. It outlines the steps we've put in place to ensure there is no slavery or human trafficking in our activities or supply chains. We all have a duty to be alert to risks. We encourage everyone working for and on behalf of Thalamos to report concerns to management and all these concerns will be investigated and acted upon if necessary.

## Organisational Structure

Thalamos Limited is a UK-based small and medium-sized enterprise (SME) operating in the digital health and public sector technology domain. The organization designs, develops, and supports cloud-based software used by health, social care, and public sector organisations within the United Kingdom.

Thalamos operates exclusively within the UK and does not undertake manufacturing, offshore labour, or high-risk operational activities. All staff have the right to live and work in the UK. We use contractors based in the UK and conduct due diligence to ensure there is no slavery and or human trafficking in our supply chains.

## Governance and Approval

This statement has been reviewed at a Senior Leadership level. It reflects the organisation's current governance, risk, and compliance arrangements. Oversight of ethical conduct, risk management, and supplier assurance is maintained through senior leadership forums and the conducting of due diligence of new suppliers is the responsibility of the Chief Information Security Officer.

## Training and Awareness

To ensure good understanding and to ensure there is no modern slavery or human trafficking in our business, training, and guidance is provided to all staff, including how to spot modern day slavery and human trafficking and expectations of staff in relation to this. This policy is also available to all staff.

## Policies and Controls

Thalamos conducts all business in an honest, transparent, and ethical manner. We are committed to ensuring there is no modern slavery or human trafficking in our business or those of our suppliers.

Thalamos maintains a suite of policies and management controls designed to prevent unethical practices, including modern slavery and human trafficking. These include, but are not limited to:

- Supply Chain Security Policy
- Information Security Policy
- Whistleblowing Policy
- ISO 27001:2022-certified Information Security Management System (ISMS)

These policies apply to all employees, contractors, and third-party suppliers and are reviewed at least annually as part of formal governance processes and maintenance of our ISMS.

Due diligence is conducted on all new suppliers, and their practices, are regularly reviewed. Thalamos does the utmost to build long-standing relationships with suppliers and all staff, visiting workplaces and meeting supplier staff where possible. We make our expectations of their business practices very clear. We review all supplier policy on modern slavery and human trafficking. We will report any suppliers we feel may be in breach of the Modern Slavery Act 2015 and sever any relationships with suppliers where we are not satisfied that the utmost is being done to prevent slavery and human trafficking.

## Due Diligence and Supply Chain Management

Due diligence is conducted on all new suppliers, and their practices are regularly reviewed. Thalamos does the utmost to build long-standing relationships with suppliers and all staff, visiting workplaces and meeting supplier staff where possible. We make our expectations of their business practices very clear. We review all supplier policy on modern slavery and human trafficking. We will report any suppliers we feel may be in breach of the Modern Slavery Act 2015 and sever any relationships with suppliers where we are not satisfied that the utmost is being done to prevent slavery and human trafficking.

Thalamos operates a risk-based approach to supplier and third-party management. Supplier assurance activities are governed by the Supply Chain Security Policy, which includes:

- A defined supplier risk assessment methodology
- Use of a structured risk matrix to assess supplier criticality and risk
- Proportionate due diligence based on the nature of the services proceeded

Supply chain risks, including ethical and compliance considerations, are reviewed as part of the organisation's ISO 27001-approved ISMS, including:

- Regular management review meetings
- Ongoing risk assessment and treatment activities
- Monthly risk log reviews

The majority of Thalamos suppliers are UK-based professional and technology service providers, which further reduces exposure to elevated modern slavery risk.

## Risk Assessment

Given the nature of Thalamos' operations as a UK-based digital services provider, the organisation assesses its inherent risk of modern slavery and human trafficking to be low. No high-risk geographies, labour models, or supply chain structures are used. Nonetheless, ethical and supply chain risks are considered as part of ongoing management and supplier review processes.

## Recruitment

Thalamos is an equal opportunities employer and carries out a rigorous vetting process for new hires including requesting the following documents: CV and employment history, right to work documentation, ID, National Insurance Number or equivalent, proof of address, and references.

## Whistleblowing and Reporting

Thalamos maintains a Whistleblowing Policy that enables employees and relevant third parties to raise concerns confidentially and without fear of retaliation. This mechanism supports the reporting of unethical behaviour, including any concerns relating to modern slavery or human trafficking.

The company encourages all workers, customers, and business partners to report any concerns related to its practices or supply chain at [thalamos.co.uk/contact-us](https://thalamos.co.uk/contact-us) or by phone at 0203 886 0385.

## Effectiveness and Monitoring

Thalamos recognises the importance of addressing modern slavery risks while applying controls that are appropriate to the size, scale, and nature of its operations as an SME.

Effectiveness is measured through:

- Supplier onboarding and review processes
- Risk management activities conducted under the ISO 27001 ISMS
- Periodic review of relevant policies and controls
- Absence of reported or identified modern slavery incidents within the business or supply chain during the reporting period.

When risks or concerns are identified, they are logged, assessed, and addressed through established governance processes.

## Publication

This statement is publicly available on the Thalamos website and is reviewed and updated on annual basis.

Signed and approved by:

Ross Tomison  
Chief Operating Officer

---

