

Modern Slavery and Human Trafficking Statement

Webjects Limited – compliance with the Modern Slavery Act 2015

COMPANY	Webjects Limited (10521644)
VERSION	1.0
ADOPTED	September 2025
REVIEW CYCLE	Annually – each September
NEXT REVIEW	September 2026
APPROVED BY	Chris Gardner, Director
LEGISLATION	Modern Slavery Act 2015

PURPOSE

This statement sets out the steps Webjects Limited ("Webjects", "we", "us") takes to prevent slavery, servitude, forced or compulsory labour and human trafficking ("modern slavery") in our business and our supply chains.

Modern slavery is a serious crime and a grave abuse of human rights. We are committed to acting ethically and with integrity in all our dealings, and to making sure modern slavery has no place in our operations or in the businesses we buy from.

Our position: Webjects has a zero-tolerance approach to modern slavery in every form. We will not knowingly work with any supplier, contractor or associate that uses slavery, forced labour or human trafficking, and we expect the same standard from everyone we do business with.

SCOPE

This statement applies to everyone who works for or on behalf of Webjects, including:

- our directors;
- any employees we may engage;
- associates, freelancers, contractors and consultants who deliver work for us; and
- the suppliers and service providers who form our supply chain.

It covers our whole business and the period from **September 2025**, when it was adopted. It will be reviewed and, where necessary, updated each September.

POLICY STATEMENT

We are a very small UK digital agency. We design and build websites, and provide hosting, search engine optimisation (SEO), branding and AI services to private and public sector clients, including councils, charities and education providers.

The honest legal position on our size. Section 54 of the Modern Slavery Act 2015 requires a commercial organisation to publish an annual slavery and human trafficking statement only where it carries on business in the UK and has a total annual turnover of **£36 million or more**. Webjects is well below that threshold, so we are **not legally required** to publish a statement. We publish this one **voluntarily**, as good practice and because we believe it is the right thing to do. We follow the spirit of the Act and the Home Office statutory guidance *Transparency in supply chains: a practical guide* in a way that is proportionate to a company of our size and risk.

We recognise that our influence over global supply chains is limited, but that this does not remove our responsibility to act within it.

OUR STRUCTURE AND SUPPLY CHAIN

Webjects Limited is a private limited company incorporated in England and Wales (company number 10521644), with its registered office in Barry, Vale of Glamorgan, Wales. We are run by two directors and supported by a small number of associates and contractors. We do not operate factories or manufacturing, we do not run low-skilled labour supply chains, and we do not source physical goods at scale.

Our supply chain is short and consists mainly of:

- software, hosting and Software-as-a-Service (SaaS) providers, predominantly based in the UK and the EU;
- domain, email and infrastructure providers; and
- occasional freelance and contractor support for design, development and content.

These are sectors with a **low inherent risk** of modern slavery. We have assessed our risk on this basis and consider it to be low, but we keep that assessment under review rather than treating "low risk" as "no risk".

RESPONSIBILITIES

WHO	RESPONSIBILITY
Director responsible	The Director owns this statement, approves it, is the point of contact for any concern, and makes sure it is reviewed each year and that the commitments in it are met.
Directors (jointly)	Set the zero-tolerance standard, approve material changes, and lead by example.
Everyone working for or with us	Read and follow this statement, stay alert to the signs of modern slavery, and raise any concern straight away.

WHAT THIS MEANS IN PRACTICE

Our measures are deliberately proportionate to our size and low risk. We commit to the following.

- 1. Supplier awareness and selection.** We favour established, reputable UK and EU suppliers. Where a new supplier presents a higher risk — for example, an unfamiliar provider operating in or sourcing from a higher-risk country or sector — we make proportionate enquiries about their labour practices before engaging them.
- 2. Risk-proportionate due diligence.** Because our supply chain is short and low risk, our due diligence is light-touch but real: we check that key suppliers are legitimate, and we look for a published modern slavery statement or equivalent commitment from larger suppliers who are themselves in scope of the Act.
- 3. Contractors and associates.** We engage associates and contractors on fair, lawful terms, pay them properly and on time, and would never use unpaid, coerced or exploited labour. We make this

expectation clear to anyone working with us.

4. **Staff awareness.** Our directors, and anyone we engage, are made aware of what modern slavery is, the warning signs, and how to report a concern. As a micro-business we handle this through direct briefing rather than a formal training programme, but the duty to stay alert is the same.
5. **Acting on concerns.** If we identify or suspect modern slavery connected to our business or supply chain, we act — including stopping work with a supplier and reporting to the authorities where appropriate (see below).

If we grow, take on staff, or move into higher-risk supply arrangements, we will strengthen these measures accordingly.

HOW TO RAISE A CONCERN

If you believe modern slavery is taking place in any part of our business or supply chain — or you are unsure — **say something**. You will not be penalised for raising a genuine concern in good faith, even if it turns out to be mistaken.

- **Internally:** contact **the Director — info@webjects.co.uk**. Concerns are treated seriously and in confidence so far as possible.
- **If someone is in immediate danger:** call **999**.
- **Modern Slavery & Exploitation Helpline: 08000 121 700** (run by the charity Unseen; confidential, 24 hours a day, every day of the year).
- **To report a crime that is not an emergency:** call the police on **101**.

We would rather look into a concern that comes to nothing than miss a real one.

CONSEQUENCES OF A BREACH

We treat any breach of this statement as a serious matter.

- For anyone working for or with us, a breach may lead to the ending of their engagement, employment or contract, and to referral to the relevant authorities where a criminal offence may have been committed.
- For a supplier, it may lead to us suspending or ending the relationship.
- Failing to report modern slavery you know or suspect is in itself a breach of this statement.

Modern slavery offences are serious crimes carrying significant penalties, including imprisonment, under the Modern Slavery Act 2015.

MONITORING AND REVIEW

This is **version 1.0** of our statement, adopted in **September 2025**. As a voluntary statement we are not bound by the statutory annual cycle, but we choose to follow it: this statement will be reviewed **annually each September**, with the next review due **September 2026**, and updated sooner if our business, supply chain or the law changes. Each review is approved and signed off by **the Director**.

We will keep this statement available to clients and prospective clients on request and, where appropriate, publish it so that it can be readily found. We may also choose to add it to the Government's modern slavery statement registry on GOV.UK.

LEGAL FRAMEWORK

This statement is made having regard to the following UK legislation and guidance (England & Wales):

- **Modern Slavery Act 2015** — in particular section 1 (slavery, servitude and forced or compulsory labour), section 2 (human trafficking) and section 54 (transparency in supply chains). Section 54(12) defines "slavery and human trafficking" by reference to the offences in sections 1, 2 and 4 of the Act. See [legislation.gov.uk — Modern Slavery Act 2015, s.54](https://legislation.gov.uk/ukpga/2015/31/section/54).
- **The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015** (SI 2015/1833), which prescribe the £36 million total turnover figure for the section 54 duty. See [legislation.gov.uk — SI 2015/1833](https://legislation.gov.uk/si/2015/1833).
- **Home Office statutory guidance, Transparency in supply chains: a practical guide**** — which sets out the recommended reporting areas: organisation structure and supply chains; policies; due diligence; risk assessment and management; effectiveness and key performance indicators; and training. See [gov.uk — Publish an annual modern slavery statement](https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement) and [gov.uk — Transparency in supply chains: a practical guide](https://www.gov.uk/guidance/transparency-in-supply-chains-a-practical-guide).

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