

MODERN SLAVERY STATEMENT

Pearl Scan Solutions Ltd

Date Updated	Document Owner	Version No.
January 2026	M N Ashraf	2.1

Document Control and Review History

Version	Date	Changes Made
1.0	January 2022	Initial statement Review
2.0	January 2025	Comprehensive update: expanded organisational structure, enhanced risk assessment section, detailed performance indicators, expanded training content, improved alignment with best practice framework
2.1	January 2026	Annual review and update.

Next Review Date: January, 2027.

Introduction

This statement is published voluntarily by Pearl Scan Solutions Ltd (Pearl Scan Group) to demonstrate our commitment to preventing modern slavery and human trafficking in our business operations and supply chains. While our annual turnover is below the £36 million threshold that would mandate reporting under Section 54 of the Modern Slavery Act 2015, we believe transparency and ethical business practices are fundamental to our values.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Pearl Scan Group maintains a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to implementing effective systems and controls to safeguard against any form of modern slavery taking place within our business or supply chain.

Our Organisation, Business and Supply Chains

Organisational Structure

Pearl Scan Solutions Ltd. (Company Registration No. 04637136). We are a privately owned limited company headquartered in the United Kingdom. Our governance structure includes:

- Board of Directors responsible for strategic oversight and policy approval
- Senior Management Team responsible for operational implementation
- Functional departments including Operations, Procurement, Human Resources, and Compliance

Our Business

Pearl Scan Group is a specialist provider of outsourced document management services operating throughout the United Kingdom. Our core services include:

- Document scanning and digitisation services
- Data capture and processing
- Document indexing and archiving
- Secure document storage and destruction

We serve clients across multiple sectors including healthcare, legal, financial services, government, and education. Our operations are conducted from our UK-based facilities with scanning and data processing activities mainly performed on-site within the United Kingdom.

Our Supply Chains

Our supply chain is relatively straightforward and primarily UK-based, comprising:

- Document scanning equipment and technology suppliers (predominantly UK and European manufacturers)
- IT hardware and software providers
- Office supplies and consumables
- Facilities management and maintenance services
- Professional services including legal, accounting, and consultancy
- Transport and logistics providers for document collection and delivery

We maintain direct relationships with our key suppliers and conduct the majority of our procurement within the United Kingdom, which reduces supply chain complexity and associated modern slavery risks.

Our Policies on Slavery and Human Trafficking

Pearl Scan Group operates comprehensive internal policies designed to ensure ethical and transparent business conduct. These policies are regularly reviewed and updated to reflect best practices and legislative requirements.

1. **Anti-Slavery and Human Trafficking Policy:** This policy explicitly prohibits any form of modern slavery within our organisation and supply chain. It sets out our zero tolerance approach, defines modern slavery, outlines employee responsibilities, and provides clear reporting mechanisms for concerns or suspicions.
2. **Recruitment and Employment Policy:** We operate robust recruitment procedures including verification of eligibility to work in the UK for all employees, verification of identity through appropriate documentation, transparent employment contracts with clear terms and conditions, and prohibition of recruitment fees charged to workers. All employees are paid at least the National Living Wage and receive written particulars of employment.
3. **Code of Business Conduct:** This code establishes expectations for ethical behaviour from all employees, contractors, and business partners. It emphasises respect for human rights, compliance with all applicable laws, and ethical treatment of workers throughout our value chain.
4. **Supplier Code of Conduct:** All suppliers are required to comply with our Supplier Code of Conduct, which explicitly addresses modern slavery, forced labour, and human trafficking. Suppliers must confirm their compliance annually and understand that breach may result in contract termination.

Due Diligence Processes

Pearl Scan Group implements comprehensive due diligence processes to identify and mitigate modern slavery risks in our business and supply chains.

Internal Due Diligence

Within our own operations, we:

- Verify right to work in the UK for all employees before employment commences
- Conduct face-to-face interviews as part of our recruitment process
- Provide written contracts and clear terms of employment to all workers
- Maintain transparent pay structures and ensure all employees are paid directly into their bank accounts
- Conduct regular workplace assessments and employee feedback sessions
- Maintain open communication channels for employees to raise concerns

Supplier Due Diligence

Our supplier due diligence process includes:

1. **Pre-Qualification Assessment:** Before engaging new suppliers, we conduct background research including online searches for any history of modern slavery violations or convictions, review of supplier policies and certifications, and assessment of supplier location and sector risk factors.
2. **Contractual Requirements:** All supplier contracts include specific anti-slavery clauses requiring suppliers to comply with the Modern Slavery Act 2015 and all applicable anti-slavery legislation, confirm they have taken steps to eradicate modern slavery within their business and supply chain, pay employees at least the applicable minimum wage, grant us the right to audit their compliance, and accept that material breach may result in immediate termination.
3. **Ongoing Monitoring:** We maintain a preferred supplier list that is reviewed annually. High-risk suppliers may be subject to on-site audits including workplace condition reviews and worker interviews where appropriate. We monitor supplier performance and investigate any concerns raised.

4. **Annual Supplier Declarations:** Key suppliers are required to provide annual written confirmation of their compliance with anti-slavery requirements and report any changes to their operations or supply chain that might increase modern slavery risk.

Recruitment Agency Due Diligence

Given the elevated risks associated with agency labour, we apply enhanced due diligence to all recruitment agencies:

Pre-Engagement Requirements:

- Valid Employment Agency Standards Inspectorate license
- Copy of agency's Modern Slavery Statement (if turnover >£36m) or equivalent policy
- Evidence of worker contracts showing transparent terms, pay rates, and deductions
- Confirmation that workers are paid at least National Minimum Wage
- References from other clients regarding ethical practices
- Proof of professional indemnity and employer's liability insurance

Ongoing Monitoring:

- Annual re-verification of agency credentials and compliance
- Investigation of any complaints or concerns raised by agency workers
- Right to audit agency employment practices
- Regular communication with agency account managers regarding worker welfare

Red Flags We Monitor For:

- Workers unable to produce personal identification documents
- Evidence of pay deductions beyond legal requirements
- Workers living in employer-controlled accommodation
- Lack of direct communication with workers
- High turnover or frequent worker complaints
- Unclear or non-transparent payment structures

Risk Assessment and Management

We have conducted a comprehensive risk assessment to identify areas of our business and supply chain where modern slavery risks may exist and implemented appropriate controls.

Risk Areas Identified

Based on our assessment, the following areas have been identified as carrying potential modern slavery risk:

- **Cleaning and Facilities Services:** These sectors are recognised as having elevated risks in the UK. Our assessment: LOW RISK due to use of established, reputable UK-based contractors with verified credentials.
- **Transport and Logistics:** Potential risks in courier and delivery services. Our assessment: LOW RISK due to use of reputable national courier companies with established employment practices.
- **IT Hardware Supply Chain:** Electronics manufacturing can involve complex international supply chains. Our assessment: LOW RISK as we source primarily from established UK and European suppliers, but acknowledge risks in upstream manufacturing.

- **Agency Labour and Temporary Workers:** The use of recruitment agencies to supply temporary or contract workers is recognised as a MEDIUM RISK area in the UK. Agency workers can be vulnerable to exploitation, and there have been documented cases of modern slavery within the UK labour supply sector. Our assessment: MEDIUM RISK - While we only use UK-based agencies, the inherent risks associated with agency labour require enhanced due diligence and ongoing monitoring.
- **Office Supplies and Consumables:** Potential risks in manufacturing of textiles, plastics, and other goods. Our assessment: LOW RISK as we source through major UK office supply retailers who maintain their own supply chain standards.

Areas of Lower Risk

The following areas of our business are assessed as lower risk:

- **Direct Employment:** The majority of our employees are directly employed by Pearl Scan Group under UK employment law. A small percentage of our workforce is engaged through reputable UK-based recruitment agencies that maintain robust recruitment and employment practices.
- **Professional Services:** Legal, accounting, and consultancy services are provided by regulated professional firms operating in the UK.
- **Core Technology Suppliers:** Our main scanning equipment suppliers are established UK and European manufacturers with strong corporate governance.

Risk Management Steps

To manage identified risks, we have implemented the following measures:

- Enhanced due diligence for suppliers in higher-risk categories
- Preference for UK-based suppliers with transparent employment practices
- Regular communication with cleaning and facilities contractors regarding their employment practices
- Requirement for IT hardware suppliers to demonstrate supply chain due diligence
- Annual review and re-assessment of supplier risk profiles
- Escalation procedures for any concerns identified during monitoring

Enhanced Controls for Agency Labour:

- **Agency Pre-Qualification:** All recruitment agencies must be licensed by the Employment Agency Standards Inspectorate and provide evidence of current licensing before engagement
- **Agency Due Diligence:** We conduct enhanced due diligence on all recruitment agencies including verification of their modern slavery policies, review of their worker contracts and pay structures, confirmation of direct payment to workers (not through intermediaries), and assessment of their own supply chain controls
- **Worker Verification:** We verify the identity and right to work documentation for all agency workers before they commence work on our premises
- **Worker Welfare Monitoring:** Regular check-ins with agency workers to ensure fair treatment, appropriate pay, and satisfactory working conditions
- **Contract Terms:** All agency contracts include specific anti-slavery clauses and requirements for transparent employment terms

We acknowledge that modern slavery risks evolve and commit to continuously reviewing and updating our risk assessment as our business and supply chains change.

Training and Capacity Building

Pearl Scan Group is committed to building awareness and capability across our organisation to identify and prevent modern slavery.

Training Programme

Our training programme includes:

- **Modern Slavery Awareness Training:** Mandatory for all procurement, HR, and management staff, conducted annually. Training covers: definition and forms of modern slavery, relevant legislation including the Modern Slavery Act 2015, indicators and red flags of modern slavery, reporting procedures and responsibilities, and case studies and practical scenarios.
- **Procurement-Specific Training:** Enhanced training for procurement team members covering supplier due diligence procedures, risk assessment methodologies, contractual safeguards, and supply chain management best practices.
- **HR and Recruitment Training:** Specific training for HR staff on identifying potential victims of modern slavery during recruitment, ethical recruitment practices, right to work verification, and supporting vulnerable workers.

Training Delivery and Format

Training is delivered through multiple formats to ensure accessibility and engagement:

- In-person workshops for management and procurement teams
- Written guidance documents and quick reference materials
- Regular policy updates and briefings

Continuous Improvement

Pearl Scan Group recognises that preventing modern slavery requires ongoing vigilance and improvement. We are committed to:

- Annually reviewing and updating this statement and our related policies
- Continuously monitoring developments in modern slavery risks and best practices
- Engaging with industry bodies and peers to share knowledge and approaches
- Responding promptly to any identified concerns or incidents
- Strengthening our due diligence processes based on lessons learned

Approval

This statement has been approved by the Board of Directors of Pearl Scan Solutions Ltd and will be reviewed annually.

Signed:

Naveed Ashraf

Director, Pearl Scan Solutions Ltd

Date: 07-01-2026

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