



Modern Slavery Statement for Financial Year 2025/2026

Last Updated By: Pete Graham – Head of Compliance

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Version Control

Once the document in its initial or proposal stage has been approved, the changes must be tracked and reviewed by senior management. All footers and version control tables must be updated on the current version. Small changes to layout or branding will be tracked by decimals (e.g. version 1.0, 1.1, 1.2) any amendments or deletions to content or the creation of a brand-new policy or procedure will be tracked by whole integers (1.0, 2.0, and 3.0)

Date	Author	Change Description	Authorised by
08/09/2023	Pete Graham – Compliance Manager	V1.0 Creation	Phil Morgan – CEO
13/12/2024	Pete Graham – Compliance Manager	V1.1 Annual Review Addition of CDD policy & updated template.	Phil Morgan - CEO
31/12/2025	Pete Graham – Compliance Manager	V1.2 Inclusion of CDD Policy, Data Transactions CDD and Onboarding Policy, Whistleblowing policy, staff wellbeing support and Supplier code of conduct. Sections condensed, inclusion of Risk Assessments and tweaks to wording.	Phil Morgan - CEO

Modern Slavery Statement for Financial Year 2025/2026

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Intelling Limited has taken during the year ending 31 December 2025 to ensure that modern slavery and human trafficking are not taking place within our business or supply chains. Intelling Limited maintains a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings, implementing effective systems and controls to prevent such practices.

What is Modern Slavery?

Modern slavery is an international crime, affecting millions of people around the world, a growing global issue that transcends age, gender and ethnicities. Sadly, vulnerable people from overseas and the UK, are forced to work illegally against their will across a number of sectors.

The Business

Intelling are a customer management business that uses a combination of clever communication, powerful data and motivated people to grow clients' businesses. By taking ownership of full customer lifecycles and nurturing them through the use of a unique data ecosystem, omnichannel approach and technology stack, significant value is added for clients by delivering cost savings, revenue growth and operational efficiency.

Intelling is an FCA-regulated customer management business serving large corporate clients. We operate contact centers in the UK, South Africa, and India, and outsource certain operations to a third-party supplier in India. Our supply chain includes technology providers, recruitment agencies, and outsourced service partners.

In general, Intelling considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Intelling values

- Integrity – Intelling promise to maintain the integrity of people through actions and the people we work with.
- DNA – By enabling people to reach their potential we create the passion, skills and flair that drives the business and partners.
- Be Different – Challenge the norm. Always think of a better way to be different.
- Commitment – We are committed to being a pro-active partner.

Policies

Intelling utilise several internal policies to ensure that business is conducted in an ethical and transparent manner. Key policies used by the business help to ensure compliance and that people are treated fairly around modern slavery. The policies include:

- Modern Slavery Policy - Detailing the strategies for the abolition of modern slavery within the business and the supply chain.
- Financial Crime Policy – Detailing the strategies around handling financial crime.
- Recruitment Policy and process. Including eligibility to work in the UK, or relevant geographic area checks for all employees safeguarding against human trafficking and individuals being forced to work against their will.
- Whistleblowing Policy. Describing how employees can raise concerns around how colleagues are treated or practices within the business or supply chain, without fear of reprisals.
- Compliant Policy – Detailing how anyone can raise their concerns and how Intelling will deal with the concern.
- Data Transactions CDD and Onboarding Policy – Detailing a robust onboarding due diligence process ensuring relevant checks are undertaken on all our suppliers.
- Supplier Code of conduct – Detailing the expectations of our suppliers which our suppliers must agree to prior to being onboarded.

Other Tools within the business

- Modern slavery awareness training. All employees are introduced to the company policies within their induction training.
- Compliance Team – Manage any concerns around modern slavery and manage due diligence of suppliers.
- Wellbeing initiatives - Managed by the HR department for all staff.
- Non-Conformance Log- detailing non-conformance across the business
- Risk Register – Reaching out to the whole business to identify risks including modern slavery risks.
- Risk Assessments – Conducted prior to changes within the business including onboarding new clients or changes to our supply chain.
- Employee Assistance Program provided by Peninsula – Independent support and advice.
- Whistle-blowing policy – Allowing reporting of incidents without the concerns of consequences.

High-risk areas for Intelling

According to the ILO's 2016 report modern slavery is most prevalent in the Asia-Pacific region and in Africa. Intelling operate offices in India and South Africa and has strategic partnerships with parties in India.

Intelling took steps to ensure the business, and our partners undertake strict due diligence especially when the business expanded, and new suppliers were introduced which required authorisation from Compliance. Hiring Managers must be aware of modern slavery and be able to look out for key signs during interviews. Intelling South Africa operate the same strict onboarding processes that are undertaken within the UK.

Intelling's Suppliers

Intelling operate through a small number of suppliers. Upon undertaking business with a new supplier, we evaluate the risk and request they undertake the relevant level of due diligence including checks around their Modern Slavery Policy.

In relation to the above, as part of Intelling's contract with suppliers, we require conformation:

- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.
- (For UK-based suppliers) they pay their employees at least the national minimum wage / national living wage (as appropriate) and equivalent overseas.
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
- Suppliers must agree to the Supplier Code of Conduct ensuring they do their part to ensure slavery doesn't occur within the supply chain.

RCA of complaints

Compliance complete root cause analysis of complaints and monitor for areas that could indicate modern slavery has occurred.

Progress

Within the last 12 months a more robust onboarding process has been introduced resulting in additional checks for all new clients and clients must adhere to the recently introduced code of conduct.

All areas of the business and our suppliers are subject to periodic audits from Compliance in line with the audit schedule to ensure adherence to the above-mentioned policies and processes.

While there were no reports of modern slavery last year, it is expected that the introduction of the more robust onboarding procedure, along with regular audits ensures protects the potential subjects and Intelling against modern slavery. This will be closely monitored with any trends of due diligence not meeting the required level or audits not meeting expectations reported to the board and relevant authorities.

Compliance will be undertaking annual reviews of the policy and process to ensure it remains robust and any trends are identified, and controls put in place to address them effectively.

If you would like more information please contact compliance@intelling.co.uk.

This statement has been approved by the Board of Directors of Intelling Limited on 31 December 2025 and will be reviewed annually. It is published in accordance with Section 54 of the Modern Slavery Act 2015 and is available on our website.

Updated 31 December 2025



Phil Morgan

Chief Executive Officer

Intelling Limited