



ENIGMA HOLDINGS GROUP LIMITED

MODERN SLAVERY STATEMENT

ORGANISATION

This statement applies to all companies within and associated to Enigma Group of companies (referred to in this statement as 'The Group'). The information included in the statement refers to the Financial year 2023-2025.

ORGANISATIONAL STRUCTURE

The Group is a collection of Companies that incorporate:

Enigma Healthcare, Enigma Wellness, Instinct Wellness Enigma Digital, MiMentor, Fuel Your Day and Enigma Legal and are classed as the **Organisations** in the Group.

Our Head Office function, known as Central Support, includes some team members working remotely and provides HR, Finance, and Corporate Governance services to the Group businesses as required. Enigma employs over 50 people in the UK on both a permanent and temporary basis.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

DEFINITIONS

The Enigma Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

The Enigma Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and exceeds those minimums in relation to its employees.

SUPPLY CHAINS

In order to fulfil its activities, the Group is committed to engaging with suppliers to address the risk of modern slavery in our operations and supply chain.

We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.

Using our risk-based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern day slavery and trafficking.

POTENTIAL EXPOSURE

In general, the Organisation considers its exposure to slavery and/or 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.

STEPS:

- Each Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct. Consistent with our risk-based approach we may require:
 - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
 - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.
- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

TRAINING

The Organisations deliver a training module on Modern Slavery as part of the compliance grouping of learning for every employee in the business. This is repeated every 12 months.

SLAVERY COMPLIANCE OFFICER

The Group head office has overview of the policy on Slavery Compliance (the HR Director), to whom all concerns regarding modern slavery should be addressed, who will then undertake relevant action to the organisation's obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Duncan Akin

CEO – Enigma Holdings Group Limited

31st March 2025