



Transparency in Supply Chains (TISC) Modern Slavery Annual Statement

Issue 6
May 2026

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1. Introduction

In the United Kingdom, businesses that classify as a 'relevant commercial organisation' are required to publish a modern slavery statement. A relevant commercial organisation subject to Section 54 of the Modern Slavery Act 2015 is defined as if you carry on your business, or part of your business in the UK, supplying goods or services and you have an annual turnover of at least £36 million.

Whilst Keystone is therefore **not** classified as a relevant commercial organisation under this criteria, it still ensures that no part of its business model or operations conflict with the aims of the Modern Slavery Act 2015.

2. Policy

Keystone established a Modern Slavery Policy in 2020 and this is reviewed annually.

3. Our Organisational Structure and Operations

Keystone is a provider of workforce management solutions, providing software and client support to organisations that seek to improve and digitise their management of staff and

contingent workers. It operates with a team of 11, based mostly in the United Kingdom providing software development, deployment, operations, client support and account management services. The majority of Keystone suppliers are also based in the United Kingdom. The business operates from London, England, with some remote based teams.

4. Our commitment to the Modern Slavery Act 2015

Even though Keystone falls beneath the threshold of the Modern Slavery Act it remains committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we are committed to creating and ensuring a nondiscriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves and as such the company has an established whistleblowing policy which all staff can access.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and are subject to all relevant Right to Work checks.

Keystone does not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour. Much of the supply chain is engaged on their terms & conditions, although modern slavery and anti-bribery elements are incorporated into the award of new or renewing contracts.

Our leadership team receive guidance in identifying and resolving concerns around modern slavery and human trafficking.

All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to the Managing Director.

5. Previous Action

All new members of staff joining Keystone received an induction which included Keystone's Modern Slavery Policy and guidance on how to draw attention to activity that might breach it.

Anti-slavery considerations were factored into procurement activities. During 2024, Keystone reviewed all suppliers across its supply chain and where practical ensured that all relevant actions could demonstrate their compliance with the principals of the Modern Slavery Act.

6. Current Action

Over the current period and until Financial year ending March 2026, Keystone is undertaking the following current actions:

- Refreshing the staff training and induction materials
- Delivering additional Home Office training to our Compliance, Quality and Training Manager
- Continuing to keep its supply chain under review and removing any organisation that does not meet the required standard
- Continuing to ensure clients accessing the workplace management services cannot hire workers outside of compliant right to work rules

This statement has been approved by Malcolm Paice, Managing Director for the financial year ending 31 March 2027. This statement is reviewed and updated every year.



Malcolm Paice
Managing Director
May 2026