

Document type: policy and minimum requirements (PMR)

# Modern slavery and human trafficking.

Governance, risk, and compliance (GRC)

Published regulatory statement



Contents

References ..... 4

    External references ..... 4

    Associated internal documents ..... 5

Terms and definitions..... 6

Scope ..... 6

Zellis Group modern slavery and human trafficking statement ..... 6

    About Zellis ..... 6

    Our policy and ongoing commitment..... 7

    Risk assessment..... 7

    Due diligence..... 8

    Our performance ..... 8

        Modern slavery and human trafficking reporting metrics..... 8

        Supply chain management enhancements ..... 8

Next steps ..... 9

Timeline of Events ..... 9

## Document control

The version of this document cancels and replaces the previous version, which should be removed from circulation.

## Document information

Item	Information
Document ID	Statutory and Regulatory Statement
Document owner	GRC – Governance, Risk, and Compliance
Filename	Modern Slavery and Human Trafficking Statement
Classification: Public	Published on the website and the UK Government Home Office public register

## Document authorisation

Approval	Role	Name	Date
Approver	Group CEO	John Petter	3 August 2023
Reviewer(s)	Company Secretary	Chris Fox	1 August 2023
	Moorepay Chief Executive Officer	Anthony Volmer	25 July 2023
	Benefex Chief Executive Officer	Matt Macri-Waller	25 July 2023
Process Owner and Author	Group Head of Compliance	Samantha Wood	20 July 2023

## Document history

Version	Description	Date
1	Annual statement established.	7 August 2019
2	Annual statement enhancements under Zellis brand.	8 August 2020
3	Rewrite of the annual statement with substantial enhancements. Cancels and replaces all previous versions. Shifting to new version and document control structure. Submission to the Home Office public register. Review of statement with amends by Alistair Scott, alignment to brand and tone, and optimisation for website publication.	6 August 2021
4	Annual statement update incorporating performance outcomes over the past 12 months	5 August 2022
5	Annual statement update and transfer to new branded group template	3 August 2023

# References

## External references

The modern slavery and human trafficking statement is documented in compliance with the following principal international standards and regulatory requirements.

Reference	Title
UNCAC	United Nations Convention Against Corruption (UNCAC)
FATF	Financial Action Task Force, predicate offences and recommendations applicable to modern slavery and human trafficking
UNGC	United Nations Global Compact
ILO	International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights of Work
POCA2002	Proceeds of Crime Act 2002
MLR2017	The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
s54(1)	The Modern Slavery Act 2015
Human Trafficking Act 2013 (Ireland)	Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013
Articles 23-24	The Constitution of India
Article 24	The Bonded Labour System (Abolition) Act, 1976, India
Child Labour Regulation	Child Labour (Prohibition and Regulation) Act, 1986, India

Reference	Title
Government registry	<p>Home Office, public register of Modern Slavery and Human Trafficking Statement. Guidance on statements: transparency on indicators of modern slavery applicable to the business, prioritisation of activity where we can make a difference, demonstrate progress against targets on:</p> <ul style="list-style-type: none"> <li>• Structure</li> <li>• Supply chains</li> <li>• Policy</li> <li>• Due diligence processes</li> <li>• Risk assessment</li> <li>• Measuring effectiveness</li> <li>• Training</li> </ul>
FRC Corporate Code	Wates Corporate Governance Principles for Large Private Limited Companies

## Associated internal documents

The associated internal documents should be read, reviewed, and updated whenever there is a change to the Modern Slavery and Human Trafficking Statement

Document Reference	Name of Document
Primary Framework	FWK0008 Financial Crimes
Supporting Frameworks	FWK0002 Corporate Governance FWK0003 Risk Management Framework
Primary Policy and Minimum Requirements	Modern Slavery and Human Trafficking
Supporting Policies and Minimum Requirements	PMR Code of Conduct and Ethics PMR Anti-Money Laundering PMR Anti-Bribery and Corruption PMR Financial Crime Prevention PMR Sustainable Procurement PMR Supplier Assurance PMR Speak Up and Whistleblowing
Statutory and Regulatory Training Content	Annual Compliance Training – Modern Slavery and Human Trafficking
Reporting	Annual Report and Accounts

## Terms and definitions

Terms and definitions defined by the internationally recognised standards which our frameworks align are applied throughout our documentation.

Refer to the independent list of terms and definitions within the *GRC Manual*.

## Scope

The scope of the Modern Slavery and Human Trafficking Statement is applicable to the Zellis Group of Companies which includes:

Zellis Holdings Limited	Benefex Limited
Zellis UK Limited	Benefex Financial Solutions Limited
Zellis Ireland Limited	Moorepay Limited
Zellis HR India Private Limited	Moorepay Compliance Services Limited
	Natural HR Limited

## Zellis Group modern slavery and human trafficking statement

The Zellis group of companies reviewed its obligations and the steps taken in the past financial year, sustaining the best possible governance and oversight provisions for ensuring no modern slavery or human trafficking takes place anywhere in our supply chain and services processes.

Our statement is made in accordance with section 54 of the *Modern Slavery Act, 2015* and is the fifth statement of publication. Our commitment to our customers, stakeholders, and the wider community is clear, and we look forward to the ongoing enhancements improving our practices for the betterment of our business and society.

### About Zellis

As the leading provider of payroll and HR solutions for UK and Ireland-based organisations, the Zellis group delivers a range of specialist products and services through its three core brands: Zellis, Benefex and Moorepay. In total, the Zellis group currently has a team of circa 2,600 expert employees across the UK, Ireland, and India.

Each month, 5 million employees across the UK and Ireland are paid through Zellis solutions. Zellis provides award-winning payroll and human capital management (HCM) software in the form of its flagship product, Zellis HCM Cloud. It is also the trusted managed services partner to more than 120 customers, delivering complex payroll, HR, background checking, and consultancy requirements from dedicated service centres across three geographies.

Founded in 1966, Moorepay provides payroll and HR solutions to small and medium-sized organisations in the UK and Ireland. With over 500 qualified staff, the company delivers its own distinct software and managed service offerings, tailored to the needs of SMEs. Its specialisms include

employment law consultancy and health and safety services among others. Moorepay recently acquired Natural HR, provider of an all-in-one feature-rich HR software and payroll system, bringing its 50 employees and 250 customers into the Zellis group.

Benefex is the Zellis group's specialist in employee benefits, reward, recognition, and communications. Benefex supports nearly 1 million employees in 140 global organisations across the UK, USA, Europe, and South-East Asia. Benefex's OneHub platform enables customers to design, manage, and deliver meaningful employee experiences, from benefits and communications to recognition and wellbeing, all in one place.

## Our policy and ongoing commitment

The Zellis group of companies takes the ongoing issue of modern slavery, human trafficking, forced and bonded labour very seriously and is committed to the global effort to combat it. We continue to ensure our products, services, and employment practices — and those of our customers — uphold these principles.

We are totally aware of the potential risks emerging from the abuse of services facilitating the processing of salary payments and employment benefits which, if penetrated by 'bad actors', can be deployed for the purposes of modern slavery including forced labour, child labour, illegal restraint, human trafficking, migrant smuggling, and extortion. We are conscious of our duty to detect, prevent, and report the associated predicate offences of corruption, bribery, and theft of a victim's wage or employment benefits, and understand that this demonstrates our commitment to the elimination of humanitarian offences, money laundering, and other types of financial crime.

We have extended the scope of our policies, principles, and code of practice to ensure our supply chain subscribes to our rigorous standards. We encourage commitment to the *Financial Action Task Force (FATF) Recommendations*, the *International Labour Organisation's Declaration on Fundamental Principles and Rights of Work*, and the *United Nations Convention Against Corruption*. To further our commitment in societal matters of this nature, Zellis Group subscribed to the *United Nations Global Compact (UNGC)*. This has formalised our position on employment rights.

We don't employ children, nor do we confiscate employee identification documents. We don't permit compulsory overtime, nor do we allow worker-paid recruitment fees, as we deem this to be bribery and corruption.

We uphold people rights to have the freedom to terminate their employment with us, enjoy freedom of movement, and freedom of association. We therefore do not prevent any employee from joining any trade union. Working practices are also designed with the welfare of our employees in mind, by ensuring their physical, mental, and emotional wellbeing is maintained and free from any threats of violence, harassment, and intimidation. We prohibit all forms of discrimination and promote equity, diversity, and inclusion within the workplace because everyone matters.

## Risk assessment

The Zellis group operates group risk management practices with localised and group-level reporting routes governed by a risk management system consisting of a framework, policy, and standard operating procedures. We apply a 'principles and outcomes' approach in risk management practices, which is underpinned by our corporate governance framework. Both the corporate governance and risk management frameworks are matters reserved for the Board and are reviewed annually for adequacy. All our management systems integrate with each other within our group *GRC Manual*, forming a dynamic suite of collateral informing our employees on best practices, influencing behaviours in our ways of working, and setting minimum standards of compliance.

Within our financial crime prevention management system, our financial crimes framework is the primary document where modern slavery and human trafficking are governed and managed. Due to its regulatory nature, we adopt a risk-based approach in the way we operationalise requirements. Modern slavery and human trafficking can be very hard to detect, especially when efforts are being made to hide this type of criminal and unethical activity. We proactively acknowledge emerging threats and adapt our controls environment to keep pace with new threats and trends through formalised, documented risk management processes

We are fully aware of how to recognise signs of modern slavery and human trafficking through our internal controls, which would trigger further investigation if identified. Our systems and controls ecosystem is under continual development, with collaboration between the skilled teams delivering our services and those maintaining compliance oversight and independent assurance over our supply chain.

## Due diligence

We have reviewed the adequacy of our governance structure in accordance with our document management processes and are satisfied our commitment, policy, and operational provisions meet requirements.

We have continued to develop our education and awareness programme, aligning the messaging to the specific nature of our business, as well as to modern slavery and human trafficking in the current context. Whilst the risk exposures are low due to the nature of our business and core services, we are committed to making sure our employees stay alert and know what to do, should they identify any suspicious activity.

Our control objectives are mapped against risks and designed to classify the control type, outline the purpose of the control and why it exists, and how to perform the control to ensure signs of modern slavery and human trafficking are detected, prevented, and reported. We continue raising awareness within the wider community through blogs on modern slavery. .

## Our performance

Last year, we committed to developing reporting metrics to demonstrate fulfilment of our modern slavery and human trafficking policy and upgrade our supply chain assurance practices.

### Modern slavery and human trafficking reporting metrics

We have integrated internal controls into our controls environment and established the reporting metrics into our financial crimes framework. We have also incorporated modern slavery reporting metrics into the *MLRO Annual Report* received by the Zellis group supervisory board's audit and risk sub-committee, due for next release in 2024.

### Supply chain management enhancements

We appointed a dedicated independent resource within the governance, risk, and compliance function to set up and deliver a fully comprehensive, auditable supplier assurance programme. The segregation of duties from sustainable procurement practices has enabled appropriate oversight and governance over our supply chain, separate to commercial activity. We are pleased with the developments of the programme since its launch in January 2022. The GRC programme has assured the business-critical suppliers within our supply chain. Our programme incorporates assessments on modern slavery, human trafficking, and child labour practices, as well as supplier management commitments to their eradication, should they occur. In the interim period, while we digitise our supply chain mapping across jurisdictions, we have developed the blueprint of our supply chain to understand where we may have



modern slavery, human trafficking, and child labour vulnerabilities. We confirm that we have selected suppliers to lower such risk exposures and have no concerns to report.

## Next steps

We invested in specialised governance, risk, and compliance systems and tooling in 2022 to enable supply chain and data flow mapping. It will connect the end-to-end processes and third parties for all our products and services. The output will create dynamic analytics and data sets providing insights and intelligence whilst enhancing our reporting capabilities.

We continue implementing this system and will also be incorporating requirements to conduct social impact assessments where we feel it is necessary to do so. This will substantially improve the quality of visibility and oversight on standards of compliance, including our supplier assurance across all relevant jurisdictions, operating systems, networks, and infrastructure.

Training and awareness modules on modern slavery and human trafficking have been well received and the results from our call for constructive feedback have been positive. In response to that feedback, we will continue to develop our scenario-based training modules over the next financial year so that our employees remain engaged and committed to the fulfilment of our policy and to the wider cause.

## Timeline of Events

Reporting Period	Description
FY2022-2023	Our policy and performance outcomes were reviewed, updated, and reported, incorporating our commitments for the next financial year. We continue developing our digital supply chain mapping. We subscribed to the UN Global Compact and enhanced our financial crime prevention provisions as well as our people policies.
FY2021-2022	Our policy and commitments adjusted, and we updated our performance outcomes towards the commitments made last year, as well as confirming our commitments for the next financial year.
FY2020-2021	Aligned our modern slavery and human trafficking statement to FATF recommendations, ILO, and UNCAC. Enhanced training to align with identifying signs of modern slavery and human trafficking through our internal control system. Increased awareness on reporting suspicious activity.
FY2019-2020	Modern slavery and human trafficking statement enhanced
FY2018-2019	Modern slavery and human trafficking statement established and published

John Petter, Group Chief Executive Officer

Zellis Holdings Ltd

Date: 3 August 2023

