

# Modern Slavery and Human Trafficking Statement

Governance, Risk and Compliance  
Published Regulatory Statement



## Contents

1	External References .....	4
2	Associated Internal Documents .....	5
3	Scope.....	6
	Zellis Group Modern Slavery and Human Trafficking Statement.....	7
	About Zellis .....	7
	Our Policy and Ongoing Commitment.....	7
	Risk Assessment.....	8
	Due Diligence .....	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 dated 6 August 2021 and 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 Company Secretary	Chris Fox	5 August 2022
Process Owner and Author	Group Head of Compliance	Samantha Wood	28 July 2022
Co-writer	Head of Communications and Branding	Alistair Scott	28 July 2022
Co-writer	Executive Director, Kochi	George Kurian	28 July 2022
Co-writer	Governance and Compliance Manager	Craig Harris	28 July 2022
Co-writer	Supplier Assurance Manager	Stella Hepburn	28 July 2022

## Document history

Version	Description	Date
1	Annual statement established	7 August 2019
2	Annual statement enhancements under Zellis brand	8 August 2020
3	Re-write 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

# 1 External References

Reference	Title
UNCAC	United Nations Convention Against Corruption <a href="https://www.unodc.org/convention-against-corruption/">Convention against Corruption (unodc.org)</a>
FATF	Financial Action Task Force, predicate offences and recommendations applicable to modern slavery and human trafficking <a href="https://www.fatf-gafi.org/">D-I - Financial Action Task Force (FATF) (fatf-gafi.org)</a>
ILO	International Labour Organisation's Declaration on Fundamental Principles and Rights of Work <a href="https://www.ilo.org/public/libdoc/decla/decla.htm">ILO Declaration on Fundamental Principles and Rights at Work (DECLARATION)</a>
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

Reference	Title
Child Labour Regulation	Child Labour (Prohibition and Regulation) Act, 1986, India
Government registry	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: <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

## 2 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 PMR Anti-Money Laundering and Countering Financing Terrorism PMR Anti-Bribery and Corruption PMR Financial Crime Prevention PMR Procurement PMR Supplier Assurance PMR Speak Up PMR Whistleblowing
Statutory and Regulatory Training Content	Annual Compliance Training – Modern Slavery and Human Trafficking

Document Reference	Name of Document
Reporting	Annual Report and Accounts

### 3 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

# 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 ensuring we sustain 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 fourth 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 group

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 2600 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.

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

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 how this demonstrably shows our commitment to the elimination of humanitarian offences, money laundering and other types of financial crimes.

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.

## **Risk assessment**

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

Our financial crimes framework is the primary document where modern slavery and human trafficking is governed and managed. Due to its regulatory nature, a risk-based approach is adopted 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 monitor emerging threats to adapt our controls environment and keep pace with new threats and trends.

We are confident in our ability to recognise signs of modern slavery and human trafficking through our internal controls which would trigger further probity if identified. Our robust control framework is under continual development in collaboration by the skilled teams delivering our services and those maintaining governance and oversight within 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 exceed requirements.

We have continued to develop our education and awareness programme, aligning the messaging to the specific nature of our business and modern slavery and human trafficking in a modern context. Whilst the risk exposures are low due to the nature of our business and core services, we are committed to making sure our colleagues 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, why the control exists and how to perform the control to ensure signs of modern slavery and human trafficking are detected, prevented and reported.

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 2023.

## **Supply chain management enhancements**

We appointed dedicated independent resource within the governance, risk and compliance function appointed to set up and deliver a fully comprehensive, auditable supplier assurance programme. We



are pleased with the result of the programme launched in January 2022 and have assured the business-critical suppliers within our supply chain. Our programme incorporates assessments on modern slavery, human trafficking and child labour practices and supplier management commitments to their eradication should they occur.

## Next Steps

We have invested in specialised governance, risk and compliance systems and tooling 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 look forward to implementing this system over the next financial year and work has already commenced. 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 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 colleagues remain engaged and committed to the fulfilment of our policy and to the wider cause.

## Timeline of Events

Reporting Period	Description
FY2021-2022	Our policy and commitment were adjusted slightly, and we have 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: 5 August 2022

For further information  
please visit [zellis.com](https://www.zellis.com)

A4190/MCC29 October 2022  
2022\_Modern Slavery and Human Trafficking Statement .docx

[zellis.com](https://www.zellis.com)

