



## Modern Slavery Act Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") and constitutes Xewli Limited's slavery and human trafficking statement for the financial year ending 30th November 2024.

### Our business

Xewli Limited is a UK-based private limited company. We are a cyber security research and development organisation providing the latest innovative technology and products that address specific customer requirements in the defence and security markets. Further information on our business can be found in our 2022 Annual Report and Accounts.

### Our policies

Xewli is committed to conducting business responsibly and ensuring, so far as we are able, that there is no slavery or human trafficking in our supply chains or in any part of our business. Xewli expects the same high standards from all of our suppliers and we will not knowingly support and/or do business with any suppliers who are involved in slavery.

### Employees

All Xewli employees (and third parties who provide services on Xewli's behalf) are required to comply with our Operational Framework and Code of Conduct. Our Code of Conduct sets out the standards of behaviour we expect of all employees in delivering Xewli's commitment to sound and ethical business conduct throughout our organisation, and in particular, stipulates that:

- we will seek to uphold all internationally recognised human rights wherever our operations are based;
- we will employ only individuals who meet the minimum legal age requirement;
- we will set employees' working hours and pay in compliance with all applicable laws; and
- we will not engage in or support the use of forced or compulsory labour.

All employees receive a copy of our Code of Conduct, and compliance and quality training is provided through our in-house training team.

## Suppliers

Our supply chain includes suppliers of raw materials and components, sub-contractors, and providers of various services. Xewli has adopted a Supplier Approval Policy as part of our Operational Framework, which sets out the governance standards and principles expected from all of our suppliers. The policy states that we will undertake appropriate due diligence on our suppliers, in order to ensure that we only do business with suppliers who meet Xewli's high ethical standards. Suppliers identified as based in or operating in potential high-risk areas are subject to enhanced due diligence requirements and ongoing compliance monitoring. Audits of suppliers are undertaken, adopting a risk-based approach. The application of our Supplier Approval Policy is monitored through our annual operational assurance process.

Xewli has also adopted a Supplier Code of Conduct for issue to all suppliers. The Supplier Code of Conduct requires suppliers to adhere to our ethical business standards, and specifically addresses the requirement for undertaking business in compliance with modern slavery and human trafficking legislation. In particular, suppliers are required to:

- comply with all applicable child labour laws, and set employees' working hours and pay in accordance with local legislative requirements;
- not engage in or support the use of forced or compulsory labour;
- not procure work or service from any person under the threat of any menace;
- allow employees to leave their employment with reasonable notice; and
- not insist that employees must surrender their passport or any work permit as a condition of employment.

Suppliers are requested to share our Supplier Code of Conduct with their own employees, partners, subcontractors and suppliers involved in the supply of goods or services to Xewli, and to request adherence to our code.

No breaches of our Supplier Code of Conduct were identified during 2023.

## Whistleblowing

Xewli is committed to a culture where employees are encouraged to speak up without fear of reprisal. Employees, suppliers or other third parties who become aware of any issue which may breach our Code of Conduct or the Supplier Code of Conduct are encouraged to raise the matter with an appropriate member of our senior management or to report the matter using our confidential reporting procedure.

There were no reports of slavery or human trafficking in 2023.

This statement was approved by the Board of Xewli on 30th November 2023 and signed on its behalf by:

Dr Sam Holland

A handwritten signature in black ink, appearing to read 'Sam Holland', is displayed on a light gray rectangular background.

**Company Director**