Modern slavery statement

Organisation

This statement applies to all companies within and associated to Ernie & Arthur Holdings Co Limited (referred to in this statement as "The Group"). The information included in the statement refers to the financial year 2026/2027

Organisational structure

Ernie & Arthur Holdings Co Limited serves as the holding company for its associated entities which include Concero UK Limited, Concero Education Technology, Concero Technology Services, and Digital Mesh Limited.

The Group operates wholly within the United Kingdom (UK) and is headquartered from a centralised office, serving as the operational hub for office-based employees. The workforce further consists of field-based and hybrid employees who engage with clients and customers both local to the centralised office or situated across multiple regions throughout the UK.

The Group primarily provides IT Services to a variety of sectors including local public services, central government, third sector, construction and financial services through a Managed Service Provider (MSP) model. The acquisition of clients and customers along with the service delivery is performed through online and in person channels. Demand for our services is consistently high throughout the year and is therefore not seasonal.

The Group actively collaborates with partnering organisations, including key partnerships with the Department for Education (DfE) and Crown Commercial Services (CCS) who share our values of integrity and ethical conduct and adhere to the highest standards of compliance with the Modern Slavery Act 2015.

At senior management level, The Group is controlled by two directors ensuring compliance with relevant regulations.

Definitions

The Organisation 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 or 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 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.

Supply chain structure

In order to fulfil its activities, the main supply chains of the Group include those related to the provision of IT support including hardware and software to aforementioned sectors from various suppliers in the United Kingdom. We understand that the Groups first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

Assessing and managing risk

In general, the Group considers its exposure to slavery/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.

- We have enquired businesses that supply directly to us and we are confident that no relevant offence is committed in that business.

- We confirm that within our own business, no relevant offence relating to slavery or human trafficking has been committed.
- Insofar as is reasonably practicable, we have examined our supply chains and confirm that we found no evidence within any other organisation which knowingly supports or is found to involve itself in slavery, servitude, forced or compulsory labour or human trafficking.



Due diligence in relation to modern slavery

The Group 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.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Group has taken the following steps to ensure that modern slavery is not taking place:

- reviewing your supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- putting measures in place to identify and assess the potential risks in its supply chains
- undertaking impact assessments of its services upon potential instances of slavery
- creating action plans to address risk to modern slavery
- any actions taken to embed a zero-tolerance policy towards modern slavery

We understand that certain industry sectors and geographical regions entail a greater risk of exploitation than others. We do not believe that our supply chains is in one of those sectors.



Policies

The Group has the following policies which further define its stance on modern slavery:

- Health & Safety Policy
- Diversity, Equity & Inclusion Policy
- Grievance Policy
- Safeguarding Policy
- Code of Conduct
- Whistleblowing Policy

Training

The Group provides the following training to staff to effectively implement its stance on modern slavery:

- Management & Leadership Training
- HR & Recruitment Training
- Modern Slavery Awareness

Data Protection

The Company will process the personal data collected in connection with the operation of the Dress Code and Uniform Policy in accordance with its data protection policy and any internal privacy notices in force at the relevant time. Inappropriate access or disclosure of personal data will constitute a data breach and should be reported immediately to the Leadership Team in accordance with the Company's data protection policy.

Reported data breaches will be investigated and may lead to sanctions under the Company's disciplinary procedure.

Modern slavery compliance officer

The Group has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Group's obligations.

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

This statement has been reviewed and approved by the Group's Directors, demonstrating our commitment to preventing modern slavery and ensuring ethical practices.

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Implementation and Policy Management

This policy shall be deemed effective as of 1 September 2026. No part of this policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

A formal review of this policy will occur every three years unless there is a significant change in relevant legislation which triggers a review before then. You will be notified in advance in the event of such changes.



Version and Revision History

Version	Date Reviewed	Author	Summary of Revisions
1.2	Aug 2021	Zoe Roberts	New version
1.3	Oct 2024	Zoe Roberts	Assessed compliance and applied relevant amendments
1.4	Sep 25	Zoe Roberts	General revision
1.5	Sep 26	Zoe Roberts	General revision