



Modern Slavery Statement for Cprime Limited

For the Financial Year Ending 2024

1. Executive Summary

Cprime Limited (formerly known as Radtac Limited) is committed to identifying and addressing modern slavery risks in our business and our supply chain. This statement describes the actions taken by Cprime Limited during the financial year from January 2024 to December 2024, in relation to our responsibilities under the UK Modern Slavery Act 2015.

For the purposes of this statement, "Cprime UK" refers to Cprime Limited. References to "Cprime" refer more broadly to the global Cprime organisation where relevant.

2. About Cprime

Cprime is a global management consultancy specialising in digital transformation, product development, technology solutions and training. Our core services help clients across various sectors to enhance their operational efficiency and drive innovation. Cprime is committed to the highest standards of ethics, business conduct, and company principles, and we expect our personnel to uphold these standards.

Cprime's operations and workforce are primarily based in the United Kingdom, United States of America, India, Australia, and Ukraine, reflecting our global service delivery model. Our services are primarily delivered through our directly employed personnel and vetted professional contractors.

As a wholly-owned subsidiary within the broader Cprime group, Cprime UK implements the principles and requirements of Cprime's Global Modern Slavery Policy while addressing its specific obligations under the UK Modern Slavery Act 2015.

3. Our Commitment and Policies on Modern Slavery and Human Trafficking

Cprime is firmly committed to upholding human rights and operating ethically. We have a zero-tolerance approach to modern slavery and human trafficking in all its forms. This commitment outlines our dedication to ensuring that our business operations and supply chain are free from modern slavery practices, reflecting our core values, purpose and principles.

Our commitment to preventing modern slavery is embedded within our core policies and practices, including:

- Cprime's Global Modern Slavery Policy, which outlines our core principles and expectations for all entities and individuals involved in our global business.

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- Our Code of Conduct, which sets out expected ethical behaviours for all employees, directors, officers, labour hire staff, contractors, and other representatives.
- Our Recruitment and Employment Policies, which ensure fair recruitment practices, robust right-to-work checks, and adherence to minimum wage and working time regulations in all operating countries.
- Cprime's Global Whistleblower Protection Policy, which details the confidential mechanism for reporting concerns without fear of retaliation.

These policies are communicated through our induction process, internal communication channels, and contractual agreements. We expect the same high standards from all our suppliers, contractors, and other business partners, and many of our contracting processes include specific prohibitions against the use of modern slavery.

The board of directors of Cprime UK has overall responsibility for ensuring that this statement complies with Cprime UK's legal and ethical obligations. Line managers are responsible for ensuring that those reporting to them understand and comply with this statement.

4. Due Diligence Processes

Cprime UK undertakes robust due diligence processes, in line with the Cprime's Global Modern Slavery Policy, to identify, assess, and mitigate the risk of modern slavery and human trafficking in our own operations and supply chains. While we have not identified any confirmed instances of modern slavery through our due diligence to date, we remain vigilant and committed to continuous monitoring and improvement.

Our due diligence processes include thorough employee vetting. For all direct employees, we conduct rigorous professional checks, including comprehensive verification of their right-to-work status in the relevant country (United Kingdom, United States, Australia, Ukraine, and India). We ensure that all personnel are paid above the applicable minimum wage, and that contractors are engaged through reputable private limited companies possessing the appropriate professional indemnities and accreditations. Responsibility for these checks ultimately lies with the HR team.

We acknowledge that identifying potential victims of modern slavery can be challenging due to its hidden nature. However, Cprime UK accepts its responsibility to ensure, through its due diligence processes, that workers are not exploited, are safe, and that relevant employment, health and safety, and human rights laws and standards are adhered to, including freedom of movement and communications.

5. Risk Assessment and Management

Cprime UK considers its direct exposure to modern slavery/human trafficking within its core operations to be relatively low due to the professional nature of our services, our established employment practices, and the skilled nature of our workforce. However, we recognise that risks

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can exist within our extended supply chain. Our primary categories of procurement spend, and thus our key areas of risk assessment, comprise:

- **Contractors (including contingent labour and other service providers):** While we work with reputable recruitment agencies and professional contractors, the broader contingent labour market can carry inherent risks related to recruitment practices and worker exploitation, especially if not adequately vetted.
- **Travel Costs and Services:** Particularly with airlines, hotels, and other travel service providers, there's an indirect risk related to the vast, often complex, supply chains involved in the travel industry.
- **Training Equipment and Facilities:** Sourcing of physical goods and use of external venues may involve supply chains with potential modern slavery risks, depending on manufacturing origins and labour practices.
- **Digital Services Relating to Online Marketing:** While largely intangible, the provision of these services can rely on underlying labour practices that may carry risks, particularly if outsourced to lower-cost regions or involving large volumes of low-skilled data processing.

To manage and mitigate these identified risks, we implement the following actions:

- **Remediation Process:** Should a risk or actual instance of modern slavery be identified within our operations or supply chain, Cprime has a clear remediation process. This includes immediate investigation, engagement with the relevant supplier/individual to implement corrective actions, and if necessary, disengagement from any supplier failing to uphold our anti-slavery standards. The Compliance team is responsible for investigating any risk or actual instance of modern slavery.
- **Continuous Monitoring:** We regularly monitor and review the effectiveness of this statement and our efforts to combat modern slavery to ensure ongoing improvement and adaptation, as required by Cprime's Global Modern Slavery Policy. The Compliance team is responsible for reviewing the effectiveness of this statement.

Our clients are often large blue-chip organisations, many of whom also have robust Modern Slavery policies and mitigation measures in place, which further reinforces our collective commitment to ethical supply chains.

6. Key Performance Indicators to Measure Effectiveness

To measure the effectiveness of the steps taken to ensure that modern slavery and human trafficking are not taking place in our business or supply chains, Cprime UK has set the following key performance indicators (KPIs) for 2025. These KPIs have been set for the upcoming financial year to drive continuous improvement beyond the period covered by this statement:

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- 100% of new employees completing mandatory modern slavery awareness training as part of their induction within three months of their start date and then undergo annual refresher training.
- All modern slavery concerns or queries, reported through our whistleblowing channels or directly to the Compliance team, investigated within 30 days and appropriate action taken.
- Periodic agenda item in Leadership Team meetings to review the effectiveness of our modern slavery prevention efforts, discuss feedback on internal practices and external supplier engagement, and identify areas for continuous improvement.

The Compliance team, overseen by the Cprime UK board, is responsible for setting and tracking these KPIs. Cprime UK's annual Modern Slavery Statement will report on the progress made against these KPIs, highlighting achievements, challenges, and areas for further focus.

7. Training and Awareness Programs

Cprime UK is committed to raising awareness and ensuring our personnel are equipped to identify and address modern slavery risks. We provide awareness programs to our personnel and relevant stakeholders on the risks and indicators of modern slavery, and their responsibilities under this statement and Cprime's Global Modern Slavery Policy.

Our training and awareness initiatives include:

- **Induction Training:** All new Cprime UK employees will receive mandatory modern slavery awareness training as part of their induction process, which covers the definitions of modern slavery, indicators of modern slavery practices, warning signs, and our company policies, including how to report concerns.
- **Policy Hub:** Our Policy Hub available on our intranet explicitly details our modern slavery policy and the responsibilities of all personnel.
- **Refresher Training:** We will aim to provide annual refresher training to ensure ongoing awareness and understanding of our policies and procedures, reinforcing our "speak up" culture.

8. Slavery Compliance Officer

Cprime UK's Slavery Compliance Officer is a key member of the Compliance team and is responsible for overseeing the implementation and effectiveness of this statement and related policies. All concerns regarding modern slavery should be addressed to the Compliance team via SpeakUp@cprime.com, who will then undertake relevant action under the guidance of the Slavery

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Compliance Officer.

This statement was approved by the board of Cprime Limited on 25 July 2025

Signed by:

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Srinivasan Veeraraghavachary
Cprime CEO and Director Cprime Limited

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