FINAFFAIRS CONSULTING LTD.

RESPONSIBLE BUSINESS

Modern Slavery Statement

Preventing forced labour and human trafficking in our business and supply chains

United Kingdom | United States
Canada | Nigeria

FCL MS 001 | Version 1.0

8 November 2026

Initial statement for approval

Finaffairs Consulting Ltd

UK company number 08324763

Consulting | Finance | Technology
Capability Development

1 Our commitment and scope

Finaffairs Consulting is committed to preventing slavery, servitude, forced or compulsory labour, human trafficking and exploitative child labour in its operations and supply chains. We will not knowingly engage in, benefit from or tolerate these practices. We will act on credible concerns, protect people who raise them and support appropriate remedy.

This is our initial transparency statement, dated 8 November 2026. It sets out our business context, the risks we will prioritise and the measures we commit to implement upon approval. It does not present planned controls as completed actions or certify any supply chain as free of exploitation.

Statement information	Detail
Issuing company	Finaffairs Consulting Ltd | UK company number 08324763
Reference and version	FCL MS 001 | Version 1.0
Statement basis	Initial voluntary statement as at 8 November 2026; subsequent annual reporting will cover the year ending 31 December.
Accountable executive	Dr Kazeem Olayimika Salaam | Founder and Managing Principal
Scope	Finaffairs Consulting operations in the UK, US, Canada and Nigeria, including employees, associates, contractors, recruitment intermediaries and suppliers.

Our business and supply chains

We provide consulting, financial advisory, finance transformation, risk and regulatory services, data and technology services, workforce solutions, training and capability development. Our supply chain includes independent consultants and specialist subcontractors, recruitment and employment agencies, software and cloud providers, IT equipment, travel and venues, office supplies and facilities services.

Professional services do not remove the risk of exploitation. Exposure can arise through outsourced and temporary labour, recruitment fees, cleaning and security, hospitality, and the production and disposal of equipment. These are priority risk categories for assessment, rather than findings of misconduct by particular suppliers or countries.

Global application and reporting basis

Our commitments apply globally. Each relevant entity must record its exact legal name, local approval and responsibility for implementation. The UK company will coordinate group reporting; a consolidated statutory statement must identify each entity it covers and reflect its actual activities.

This statement follows the subject areas in section 54 of the UK Modern Slavery Act 2015. We will assess annually whether mandatory reporting applies, including the relevant turnover calculation and subsidiary undertakings. Voluntary publication does not establish exemption or replace any separate reporting duty in another jurisdiction. The annual statement will describe the steps actually taken during the reporting year.

2 Governance and priority risk controls

Accountability and supporting policies

The Managing Principal will oversee implementation and review progress quarterly. Procurement and Finance responsibilities will follow the approved delegation arrangements. Contract owners will assess risks, verify evidence and monitor corrective actions. Human resources or the person managing recruitment will apply the workforce controls below.

The Sustainable Procurement Policy, supplier code and due diligence questionnaire have been prepared for management approval. They provide the intended framework for risk-based supplier checks, independent approval, grievances and contract monitoring. Their preparation is a governance step; adoption, training, supplier screening and operating effectiveness must be evidenced separately. Independent reviewer and deputy arrangements must be completed before those roles are relied on.

Fair recruitment and employment

We will verify recruitment intermediaries and lawful employment arrangements, provide clear written terms in a language workers understand, and check pay, hours and deductions against applicable requirements. Work must be freely chosen. Workers must be able to leave employment on lawful notice and retain access to their identity documents and personal possessions.

Workers must not pay recruitment fees or related costs to obtain work for Finaffairs. We will investigate any such charges and seek reimbursement by the responsible party, ensuring that a remedy reaches the worker. We prohibit deposits, debt bondage, threats, coercive document retention and unlawful restriction of movement. Recruitment and right-to-work checks must be conducted lawfully, respectfully and without using immigration status to intimidate workers.

Assess risks beyond the contract price

We will consider the labour model, recruitment channels, vulnerability of workers, geography, subcontracting depth, sector, working conditions and credible adverse information. A low-value contract can present high labour risk. Where the assessment identifies a material human-rights exposure, enhanced checks and at least quarterly review will apply under the procurement framework.

Priority exposure	Checks and response
Agency labour and subcontracted services	Verify employer and recruiter identities, terms, fees, pay arrangements, subcontractors and worker access to concerns channels.
Facilities travel and hospitality	Examine outsourcing, recruitment practices and credible labour concerns; select proportionate contractual and monitoring controls.
Equipment and indirect supply chains	Seek relevant sourcing and labour information, credible assurance and corrective-action evidence from suppliers; investigate significant gaps.
Delivery in unfamiliar markets	Assess local recruitment and labour risks, use qualified advice when needed and check how remote workers can raise concerns safely.

3 Due diligence, reporting and remedy

Supplier selection and ongoing monitoring

Before an engagement, we will apply proportionate identity, integrity, capability and labour checks, using the procurement questionnaire or equivalent evidence. We will seek acceptance of the supplier code or an approved equivalent, identify material subcontractors and investigate credible warning signs. Routine low-risk purchases will use proportionate controls, but red flags or binding client requirements override a simplified route.

Contracts will require compliance with applicable labour and human-rights obligations, notification of serious concerns, cooperation with reasonable verification and corrective action, and relevant obligations for material subcontractors. Documentary policies and certifications alone will not be treated as proof that workers are protected.

Higher-risk review may include worker interviews conducted safely and independently of supervisors, recruitment and payroll samples, subcontractor mapping, specialist advice and proportionate site or remote assessment. We will avoid exposing workers to retaliation or collecting unnecessary personal information. Client and UN contractual requirements will be applied where relevant.

Recognising and raising concerns

Warning signs may include workers who cannot leave, withheld wages or identity documents, unexplained deductions, recruitment debts, threats, controlled communication or accommodation, excessive hours, or an intermediary speaking for workers in circumstances suggesting coercion. A warning sign requires sensitive assessment; it is not itself proof of exploitation.

Employees, contractors, suppliers and affected people may raise concerns confidentially with the Managing Principal at kazeem.salaam@finaffairsconsulting.com. Reports may be made without proof and without retaliation. We will assess anonymous information where received. Reporting routes must be communicated accessibly to workers and relevant suppliers.

Where a concern involves the Managing Principal, the reporting person may approach a competent authority or an appropriate independent adviser directly. Once an Independent Reviewer and deputy are appointed, their direct contact details will also be communicated to staff and suppliers. No internal reporting route restricts the right to report externally. Anyone facing immediate danger should contact the appropriate local emergency service.

Protect people and remedy harm

We will assess immediate safety promptly, restrict access to sensitive reports and escalate credible serious concerns immediately, and in any event within one working day, subject to any shorter legal or contractual deadline. We will seek specialist safeguarding or legal support where needed and follow applicable reporting duties. We will consider an adult affected person's wishes and informed consent where appropriate, while recognising safeguarding and legal obligations.

Responses will prioritise safety and avoiding further harm. Where we caused or contributed to harm, we will provide or cooperate in appropriate remedy. Where a supplier is implicated, we will use our influence to seek protection, repayment of unlawful fees or wages and correction of recruitment or working conditions, with owners, deadlines and verification. We may suspend new orders or terminate under contract, assessing the consequences for workers rather than disengaging automatically.

4 Capability, progress and approval

Training and implementation commitments

We will train recruitment, procurement and supplier-management personnel before delegated authority. Role-specific learning will cover risk indicators, fair recruitment, worker communication, escalation and remedy. Annual refreshers and practical scenarios will assess understanding.

From approval, the Managing Principal will assign operational owners and activate reporting routes. Within 60 days we will map priority labour exposures and review higher-risk active suppliers; within 90 days we will complete the initial supplier baseline and approve further improvement targets. These timeframes do not delay action on a credible concern or any legal duty.

Measure	Commitment and evidence
Supplier risk assessment	Assess all new engagements before commitment; record the population, risk rating, evidence and any exceptions.
Higher-risk monitoring	Review all higher-risk suppliers at least quarterly; track issues, worker engagement and overdue actions.
Training and capability	Train relevant personnel before delegated authority and refresh annually; record participation and understanding.
Remedy and worker outcomes	Track verified fee or wage repayments, workers receiving appropriate support, action closure and recurrence without publishing identifying details.
Annual transparency	Report actual coverage, results, limitations, lessons and next steps; distinguish completed actions from commitments.

A verified baseline for screening, training, incidents and worker outcomes has not yet been established. Annual reporting will distinguish evidence of results from planned actions. Few or no reports will not be treated as proof that exploitation does not occur.

Review and publication

We will review annually and after a material business change or serious incident. The first progress update will cover the year ending 31 December 2026, with publication intended by 30 June 2027 after verification and approval. Approved statements will be linked from our website homepage, with earlier versions retained.

Approval

Approval authority: Dr Kazeem Olayimika Salaam, Director, Founder and Managing Principal. Record the UK company's approval decision and date before publication, and relevant overseas entity approvals where issued on their behalf.

Approval record	
Director signature	
Approval date	10/05/2026

Reference: Modern Slavery Act 2015, section 54; Home Office, Publish an annual modern slavery statement and Transparency in supply chains guidance, checked 8 November 2026. https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement