Language Empire Ltd

Modern Slavery Statement

This statement is made pursuant to Section 54, of the Modern Slavery Act 2015

Applicable to:

Employees, freelancers, contractors,
subcontractors, consultants, volunteers,
those on work experience and student placements.

Version 2.0

Date created: 23/09/2026

Language Empire policies can be provided in alternative formats such as large print, Braille, Easy Read and other languages (including sign language) upon request.

Version Control

Date	Version	Created by	Description of change
17/09/2024	1	Zuzana Murphy	Policy Statement Created and Published
23/09/2026	2	Muhammad Waqas	Scheduled revision and update as per home office guidance

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1. Policy statement

Language Empire Ltd recognises its responsibility to prevent modern slavery and human trafficking within its business operations and supply chains. We adopt a zero-tolerance approach to all forms of modern slavery.

We are committed to conducting our business ethically, transparently and with integrity, ensuring that human rights, dignity and fair treatment remain fundamental to our employment practices, service delivery and business relationships.

As a provider of interpreting, translation and associated language services, we recognise our responsibility towards our employees, freelance linguists, contractors, suppliers and other individuals involved in delivering services on our behalf.

We are committed to implementing proportionate and effective measures to identify, prevent, mitigate and address modern slavery risks and to continually improve our practices in line with legislative requirements and recognised industry standards.

2. Scope

This policy applies to all employees and potential employees of Language Empire. It also applies to all those working for or on behalf of Language Empire such as freelancers, contractors, suppliers, subcontractors, consultants, volunteers, those on work experience, apprentices and student placements.

The policy applies to all areas of employment and service delivery.

3. Legal Framework and Related Policies

This statement is prepared in accordance with Section 54 of the Modern Slavery Act 2015, taking into account the Home Office's statutory guidance on transparency in supply chains and, where applicable, Procurement Policy Note (PPN) 009 – Tackling Modern Slavery in Government Supply Chains.

This statement is supported by the following company policies and arrangements:

- Slavery and Human Trafficking Policy
- Whistleblowing Policy
- Equality and Diversity Policy
- Anti-Bribery Policy
- Grievance Policy
- Health and Safety Policy
- Employee Handbook.
- Supplier Code of Conduct and Assessment policies

These policies collectively support our commitment to preventing exploitation, promoting ethical working practices and maintaining a safe, fair and transparent working environment.

4. Due Diligence Processes

We undertake proportionate and risk-based due diligence to identify, prevent and mitigate the risks of modern slavery and human trafficking within our business operations and supply chains. These processes include:

- **Supplier Assessment and Compliance:** Conducting background checks and assessments of new and existing suppliers, covering modern slavery, health and safety, ethical working practices and other relevant compliance requirements. Suppliers are required to demonstrate compliance with applicable legislation, including the Modern Slavery Act 2015, and adhere to Language Empire's ethical and contractual standards.

- **Ethical and Safer Recruitment:** Ensuring fair and transparent recruitment and onboarding of employees and freelance linguists through appropriate identity and right-to-work checks, clear contractual terms and safeguards against exploitative practices.

- **Contractual Obligations:** Reviewing supplier contracts to incorporate appropriate anti-slavery provisions, including the right to suspend or terminate agreements where serious non-compliance is identified.

- **Ongoing Monitoring:** Conducting periodic supplier reviews, internal audits and compliance assessments to identify potential risks, monitor compliance and implement appropriate corrective and preventative actions.

5. Risk Assessment and Management

Given the nature of our industry and service delivery model, we recognise the following key areas of potential risk:

- **Freelance Workforce:** Potential exploitation, coercion and financial vulnerability associated with freelance and remote working arrangements.

- **Recruitment Practices:** Unethical recruitment, exploitative fees, forced labour and unfair working arrangements.

- **Suppliers and Subcontractors:** Inadequate labour standards, undisclosed subcontracting and limited visibility across wider supply chains.

- **Geographical Risks:** Variations in employment protections, labour standards and regulatory enforcement across different regions.

Our approach to mitigating these risks includes:

- **Supply Chain Mapping:** Identifying and mapping key suppliers and subcontractors to improve transparency and identify potential areas of vulnerability.

- **Risk Profiling:** Assessing and prioritising risks based on geographical location, industry sector, workforce vulnerability and supply chain complexity.

- **Audits and Monitoring:** Undertaking proportionate internal and supplier audits to evaluate compliance and the effectiveness of existing controls.

- **Enhanced Due Diligence:** Applying additional scrutiny and monitoring to suppliers and working arrangements identified as higher risk.

- **Corrective and Preventative Actions:** Addressing identified risks and non-compliance through appropriate interventions, remediation and follow-up reviews.

We are committed to regularly reviewing our risk exposure and the effectiveness of our mitigation strategies in response to emerging risks, legislative developments and changes in our business operations and supply chains.

6. Training and Capacity Building

We provide training to our employees and contractors to raise awareness of modern slavery risks. Training is included in our induction program and covers:

- Identifying signs of modern slavery.
- Reporting concerns confidentially.
- Legal and ethical responsibilities under the Modern Slavery Act.

7. Governance and Responsibilities

The Board of Directors has overall responsibility for ensuring that Language Empire meets its legal, ethical and contractual obligations relating to modern slavery and human trafficking.

- **Board of Directors:** Providing strategic oversight and approving the annual Modern Slavery Statement.

- **Compliance Manager:** Overseeing implementation, monitoring compliance, coordinating risk assessments and reporting concerns to senior management.

- **Departmental Managers:** Ensuring compliance within their respective business areas, workforce arrangements and supplier relationships.

- **Employees, Linguists and Contractors:** Adhering to relevant company policies and promptly reporting any actual or suspected instances of modern slavery.

Language Empire will maintain appropriate management oversight to ensure the effectiveness of its modern slavery prevention measures and fulfilment of its statutory and contractual obligations.

8. Monitoring and Measuring Effectiveness

Language Empire monitors the effectiveness of its modern slavery prevention measures through regular reviews, compliance assessments, and relevant Key Performance Indicators (KPIs).

These include:

- Percentage of employees and linguists completing modern slavery awareness training.
- Percentage of suppliers completing relevant due diligence and compliance assessments.
- Number and outcomes of supplier risk assessments and internal audits.
- Number of modern slavery concerns reported, investigated and addressed.
- Completion and effectiveness of corrective and preventative actions.

Performance and findings are reviewed by management to evaluate existing controls, identify areas for improvement and strengthen our approach to preventing modern slavery and human trafficking. Progress will be reflected in our annual Modern Slavery Statement.

9. Review and Publication

This statement will be reviewed regularly, to reflect legislative developments, contractual requirements and changes in our business operations and supply chains.

The statement will be approved by the Board of Directors, signed by a Director and published on Language Empire's website, with a prominent link on the homepage. It will also be communicated to relevant stakeholders and submitted to contracting authorities in accordance with applicable contractual requirements.

Language Empire remains committed to continuously improving its practices to prevent modern slavery and human trafficking throughout its business operations and supply chains.

This statement covers the financial year ending March 2026 and was approved by the Board of Directors on 23rd September, 2026.

Neelam Ahmed

Approved by:

Neelam Ahmed
Director Operations