

## **Modern Slavery and Human Trafficking Statement**

### **Caroola Accountancy Limited**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps taken by Caroola Accountancy Limited during the financial year ending 31 October 2026 to prevent modern slavery and human trafficking within our business and supply chains.

Caroola Accountancy Limited is committed to conducting business ethically, responsibly and with integrity. We recognise that modern slavery, forced labour, servitude and human trafficking are serious abuses of human rights and have no place in our organisation or supply chains.

We operate a zero-tolerance approach to modern slavery and human trafficking and are committed to maintaining effective systems and controls designed to identify, prevent and mitigate the risk of such practices occurring.

### **About Caroola Accountancy**

Caroola Accountancy Limited provides accountancy, taxation, payroll and advisory services to contractors, freelancers, small businesses and limited companies throughout the United Kingdom.

Our operations are based within the United Kingdom, and we work with a range of suppliers, technology providers, professional service providers and business partners who support the delivery of our services.

We are committed to ensuring that all employees have the legal right to work in the UK and are treated fairly, respectfully and in accordance with all applicable employment legislation.

### **Our Commitment**

Caroola Accountancy is committed to:

- Acting ethically and with integrity in all business relationships.
- Preventing modern slavery and human trafficking within our operations and supply chains.
- Operating effective governance and compliance controls.
- Promoting awareness and education throughout the business.
- Taking appropriate action where concerns are identified.

03330 342 481  
caroola.com

Caroola Accountancy Limited  
Company number: 06277058  
Registered office: 840 Ibis Court,  
Centre Park, Warrington, Cheshire, WA1 1RL  
(Registered in England and Wales).

- Supporting a culture where employees feel able to raise concerns without fear of retaliation.

We expect our suppliers, contractors and business partners to uphold similar standards and operate in compliance with applicable laws relating to modern slavery, labour exploitation and human rights.

### **Supply Chains and Due Diligence**

Our supply chain primarily consists of:

- Professional service providers.
- Software and technology suppliers.
- Outsourced service providers.
- Office and facilities suppliers.
- Consultants and contractors.
- Business support partners.

We seek to work only with reputable organisations that demonstrate a commitment to responsible and ethical business practices.

As part of our supplier onboarding and review processes, we may undertake appropriate due diligence measures including:

- Reviewing publicly available information.
- Assessing supplier reputation and conduct.
- Reviewing supplier policies and procedures where appropriate.
- Considering the nature and location of services being provided.
- Assessing any identified risks.

Where concerns are identified, we may undertake additional investigations or choose not to enter into, or continue, a business relationship.

### **Governance and Responsibility**

Responsibility for this statement and the associated Modern Slavery Policy rests with Compliance.

Compliance is responsible for:

- Oversight of modern slavery risk management.
- Ensuring the continued effectiveness of this policy.
- Responding to concerns and reports.
- Reviewing controls and due diligence processes.
- Supporting employee awareness and training.

The Executive Leadership Team retains overall responsibility for ensuring that appropriate resources, systems and controls are in place.

### **Policies and Procedures**

To support our commitment to preventing modern slavery, Caroola Accountancy maintains a number of related policies and procedures, including:

- Modern Slavery Policy.
- Whistleblowing Policy.
- Recruitment and Employment Procedures.
- Anti-Bribery and Corruption Policy.
- Anti-Money Laundering Policy.
- Equal Opportunities Policy.
- ESG Policy.

These policies are reviewed periodically to ensure they remain fit for purpose and aligned with legislative requirements and best practice.

### **Employment Practices**

We are committed to maintaining fair and ethical employment practices throughout our business.

This includes:

- Verifying employees' right to work.
- Complying with applicable employment legislation.
- Providing written employment contracts.
- Paying employees fairly and in accordance with legal requirements.
- Promoting equality, diversity and inclusion.
- Providing appropriate wellbeing and support resources.

We do not knowingly engage with any form of forced labour, compelled labour, bonded labour or human trafficking.

### **Risk Assessment**

We periodically assess the nature and extent of our exposure to modern slavery risks within our business and supply chains.

As a UK-based professional services organisation, we assess our overall direct risk as relatively low.

However, we recognise that risks can still arise through supplier relationships, outsourcing arrangements and service providers.

Accordingly, we continue to review:

- Supplier relationships.
- Outsourced service arrangements.
- Recruitment practices.
- Business processes and controls.

Where risks are identified, appropriate action is taken to mitigate them.

### **Whistleblowing and Reporting Concerns**

Caroola Accountancy encourages employees, contractors, suppliers and other stakeholders to raise concerns where they suspect inappropriate conduct, unethical behaviour or potential instances of modern slavery.

Concerns may be reported through management channels or via the Company's Whistleblowing Policy.

All concerns are taken seriously and investigated appropriately.

We are committed to ensuring that individuals who raise genuine concerns in good faith are protected from retaliation.

### **Training and Awareness**

Caroola Accountancy recognises the importance of educating employees about modern slavery risks.

We seek to:

- Raise awareness of modern slavery and labour exploitation.
- Help employees recognise warning signs and indicators.
- Promote understanding of reporting responsibilities.
- Support managers in handling concerns appropriately.

Training and awareness activities form part of our broader compliance and governance framework.

### **Incidents During the Reporting Period**

No incidents of modern slavery or human trafficking were reported to, or identified by, Caroola Accountancy Limited during the financial year ending 31 October 2026.

### **Future Priorities**

We remain committed to continuously improving our approach to preventing modern slavery and human trafficking.

Over the next reporting period we will continue to:

- Review supplier due diligence procedures.
- Maintain employee awareness and training.
- Review policies and procedures in response to legal and regulatory developments.
- Monitor emerging risks within our supply chains.
- Promote awareness and reporting throughout the business.
- Continue internal reviews of our compliance framework.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 October 2026.