

# Modern Slavery and Human Trafficking Statement

Published Regulatory Statement



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## Document control

The version of this document cancels and replaces the previous version dated 5 August 2020 and should be removed from circulation.

## Document information

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## Document authorisation

Approval	Role	Name	Date
Approver	Group Chairman Zellis Chief Executive Officer	John Petter	Fri 6 August 2021
Reviewer(s)	Chief Financial Officer	Alan Kinch	5 August 2021
	Moorepay Chief Executive Officer	Anthony Volmer	5 August 2021
	Benefex Chief Executive Officer	Matt Macri-Waller	5 August 2021
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Co-writer	Executive Director, Kochi	George Kurian	04 August 2021
Co-writer	Procurement Director	Matt Row	04 August 2021

## Document history

Version	Description	Date
1	Annual statement established	7 August 2019
2	Annual statement enhancements under Zellis brand	8 August 2020
3	Re-write of the annual statement with substantial enhancements. Cancels and replaces all previous versions. Shifting to new version and document control structure. Submission to the Home Office public register Review of statement with amends by Alistair Scott, alignment to brand and tone, and optimisation for website publication.	6 August 2021

# 1 External References

Reference	Title
UNCAC	United Nations Convention Against Corruption <a href="https://www.unodc.org/convention-against-corruption/">Convention against Corruption (unodc.org)</a>
FATF	Financial Action Task Force, predicate offences and recommendations applicable to modern slavery and human trafficking
ILO	International Labour Organisation's Declaration on Fundamental Principles and Rights of Work <a href="https://www.ilo.org/public/libdoc/iloorg/1998/0/1998001.pdf">ILO Declaration on Fundamental Principles and Rights at Work (DECLARATION)</a>
POCA2002	Proceeds of Crime Act 2002
MLR2017	The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
s54(1)	The Modern Slavery Act 2015
Human Trafficking Act 2013 (Ireland)	Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013
Articles 23-24	The Constitution of India
Article 24	The Bonded Labour System (Abolition) Act, 1976, India
Child Labour Regulation	Child Labour (Prohibition and Regulation) Act, 1986, India

Reference	Title
Government registry	<p>Home Office, public register of Modern Slavery and Human Trafficking Statement. Guidance on statements: transparency on indicators of modern slavery applicable to the business, prioritisation of activity where we can make a difference, demonstrate progress against targets on:</p> <ul style="list-style-type: none"> <li>• Structure</li> <li>• Supply chains</li> <li>• Policy</li> <li>• Due diligence processes</li> <li>• Risk assessment</li> <li>• Measuring effectiveness</li> <li>• Training</li> </ul>
FRC Corporate Code	Wates Corporate Governance Principles for Large Private Limited Companies

## 2 Associated Internal Documents

The associated internal documents should be read, reviewed and updated whenever there is a change to the Modern Slavery and Human Trafficking statement

Document Reference	Name of Document
Rulebook	Code of Conduct
Framework	Corporate Governance
Framework	Risk Management
Framework	Anti-Money Laundering
Standards	System and Controls Standards for AML Controls
Policy	Modern Slavery and Human Trafficking
Policy	Anti-Money Laundering and Countering Financing Terrorism
Policy	Anti-Bribery and Corruption
Policy	Supply Chain Management and Sourcing Principles
Policy	Speak Up
Policy	Whistleblowing
Training Content	Annual Compliance Training
Reporting	Annual Report and Accounts

Document Reference	Name of Document
Reporting	ESG, Environmental, Social and Governance

### 3 Scope

The scope of the Modern Slavery and Human Trafficking Statement is applicable to the Zellis Group of Companies which includes:

Zellis Holdings Limited

Benefex Limited

Zellis UK Limited

Benefex Financial Solutions Limited

Zellis Ireland Limited

Moorepay Limited

Zellis HR India Private Limited

Moorepay Compliance Services Limited

# Zellis Group Modern Slavery and Human Trafficking Statement

The Zellis group of companies has reviewed its obligations and the steps taken in the past financial year to ensure we continue to maintain the best possible governance and oversight to ensure no modern slavery or human trafficking is taking place anywhere in our supply chain and services processes.

Our statement is made in accordance with section 54 of the Modern Slavery Act, 2015 and is the third statement of publication. Our commitment to our customers, stakeholders and the wider community is clear, and we look forward to continuing to enhance and improve our practices for the betterment of our business and society.

## About Zellis

As the leading provider of payroll and HR solutions for UK and Ireland-based organisations, the Zellis group delivers a range of specialist products and services through its three core entities: Zellis, Benefex and Moorepay. In total, the Zellis group currently has a team of circa 2600 expert staff across the UK, Ireland, and India.

Each month, 5 million employees across the UK and Ireland are paid through Zellis solutions. Zellis provides award-winning payroll and human capital management (HCM) software in the form of its flagship product, Zellis HCM Cloud. It is also the trusted Managed Services partner to more than 120 customers, delivering complex payroll, HR, background checking, compliance, and consultancy requirements from dedicated service centres across three geographies.

Founded in 1966, Moorepay provides payroll and HR solutions to small and medium-sized organisations in the UK and Ireland. With over 500 qualified staff, the company delivers its own distinct software and managed service offerings, tailored to the needs of SMEs. Its specialisms include employment law consultancy and health and safety services among others.

Benefex is the Zellis group's specialist in employee benefits, reward, recognition, and communications. Benefex supports nearly 1 million employees in 140 global organisations across the UK, USA, Europe, and South-East Asia. Benefex's OneHub platform enables customers to design, manage and deliver meaningful employee experiences, from benefits and communications to recognition and wellbeing, all in one place.

## Our Policy and Commitment

Zellis group of companies takes the ongoing issue of modern slavery and human trafficking very seriously and is committed to the global effort to combat it. We are committed to ensuring our products, services and employment practices, and those of our customers, uphold these principles.

We are totally aware of the potential risks emerging from the abuse of services that facilitate the processing of salary payments and employment benefits which, if controlled by 'bad actors', can be deployed for the purposes of modern slavery including forced labour, child labour, illegal restraint, human trafficking and migrant smuggling, extortion. We are conscious of our duty to detect, prevent and report the associated predicate offences of corruption, bribery, and theft of a victim's wage, or employment benefits and understand that this demonstrates of our commitment to the elimination of humanitarian offences and anti-money laundering crimes.

We are, as of this year, extending the scope of our policies, principles and code of practice to ensure our supply chain subscribes to our rigorous standards. We encourage commitment to the Financial

Action Task Force (FATF) Recommendations, the International Labour Organisation's Declaration on Fundamental Principles and Rights of Work, and the United Nations Convention Against Corruption.

## Risk Assessment

Modern slavery and human trafficking can be very hard to detect, especially when efforts are being made to hide criminal and unethical activity. Zellis group operates a hybrid risk reporting structure with localised and group-level reporting routes. It is governed by a risk management framework applying a 'principles and objectives' approach.

We are fully aware of how to recognise signs of modern slavery and human trafficking through our internal controls which would trigger further probity if identified. Our robust control framework is under continual development in collaboration by the skilled teams delivering our services and those maintaining governance and oversight on our supply chains.

## Due Diligence

We have made fundamental enhancements to our education and awareness programme, aligning the messaging to the specific nature of our business and modern slavery and human trafficking in a modern context. Whilst the risk exposures are low, we are committed to making sure our colleagues stay alert and know what to do should they identify any suspicious activity.

Our control objectives are mapped against risks and designed to classify the control type, outline the purpose of the control, why the control exists and how to perform the control to ensure signs of modern slavery and human trafficking are detected, prevented and reported.

## Next Steps

Over the next financial reporting year, the Board and the Executive shall work towards establishing, implementing and reporting new metrics to demonstrate fulfilment of our Modern Slavery and Human Trafficking Statement.

A key focus area will be upgrading our supply chain management practices, outlining clear auditable trails to identify jurisdictional boundaries, assessing ethical practices and codes of conduct of our suppliers and providing evidence of our high standards of compliance.

## Timeline of Events

Reporting Period	Description
FY2020-2021	Aligned our modern slavery and human trafficking statement to FATF recommendations, ILO, and UNCAC. Enhanced training to align with identifying signs of modern slavery and human trafficking through our internal control system Increased awareness on reporting suspicious activity.
FY2019-2020	Modern slavery and human trafficking statement enhanced
FY2018-2019	Modern slavery and human trafficking statement established and published

John Petter, Group Chairman and Zellis Chief Executive Officer

Zellis Holdings Ltd



Date: 6 August 2021

**For further information  
please visit [zellis.com](https://www.zellis.com)**

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