

## 1.1 Modern Slavery Statement

Although we are not obliged to publish a statement pursuant to the criteria under section 54 of the Modern Slavery Act 2015, nonetheless this brief statement outlines our commitment to practical compliance for a company of our size. We have a zero tolerance policy to all aspects of slavery and exploitation. We consider modern slavery to encompass:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

## 1.2 Our Organisation

Black Rainbow is a software development and sales company focused on servicing the Law Enforcement, Government and Corporate Markets. Our heritage is in Law Enforcement and our software is used by Agencies who use it to investigate and prosecute crimes which may include human trafficking and slavery. Our development teams are UK based and we have sales and operations resources based in Ireland, all of whom are vetted prior to joining.

## 1.3 Risk

Our current organisation and supply chain pose negligible to no risk from a slavery and human trafficking perspective. We have a very tight supply chain with no material inputs outside of the UK.

Our staff, operations and markets and customers we serve proactively work to fight crime including slavery and human trafficking via our NIMBUS product. In terms of employment, we offer well paying positions within the company with supporting benefits package. We do not offer zero hour contracts and pay all employees well above the living wage.

## 1.4 Ongoing Commitment

We will proactively monitor our supply chain, should it change in any material way to identify human trafficking and slavery risks. We will use appropriately qualified third-party professionals and organization's to carry out this assessment on our behalf.

## 1.5 Training

Modern slavery training is included as part of the ongoing training assigned to all staff.

## 1.6 Approval

We are committed to making sure that our activities and our decisions do not in any way contribute to modern slavery in any of its forms.

This statement has been formally approved by the Directors of Black Rainbow Ltd. for the calendar year 2026.

Signed

(James Kent, CEO)



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Date 5<sup>th</sup> January 2026