



Modern Slavery & Human Trafficking Statement

Reference

MSA

Classification

Public

Executive Declaration & Scope

This statement is published voluntarily by PATH MSC. Under Section 54 of the UK Modern Slavery Act 2015, formal statutory reporting is mandated exclusively for commercial organizations with an annual turnover exceeding £36 million. While PATH MSC operates as a Small and Medium Enterprise (SME) below this statutory fiscal threshold, we choose to align our corporate governance directly with the letter and spirit of the law.

In light of recent UK corporate reporting updates, public procurement shifts, and the introduction of stricter supply chain transparency frameworks, PATH MSC enforces an absolute zero tolerance threshold toward modern slavery, servitude, human trafficking, or forced labour anywhere within our operations, platform architectures, or extended supply networks.

1. Our Organizational Structure, Business, and Supply Chains

PATH MSC is a UK incorporated Business, IT and HR consulting company provides software and web engineering solutions, specialising in the design, development, hosting and ongoing support of digital platforms and content management systems for client organisations. As a remote-first, cloud-native operation, we do not carry complex physical manufacturing, raw material logistics, or agricultural supply chains. Our corporate supply chain is tightly contained, modern, and restricted to high-tier technology and professional service providers, categorized across three primary tiers:

- **Tier 1 (Infrastructure):** Globally established, enterprise public cloud infrastructure and data center providers (e.g. Microsoft Azure, AWS, Google).
- **Tier 2 (Tooling):** Reputable global software tool vendors and digital communication platforms.
- **Tier 3 (Professional Services):** Highly qualified professional technical services, software engineering consultants, and localized hardware providers.

2. Core Policies on Slavery and Human Trafficking

PATH MSC's ethical baseline is actively enforced via internal governance frameworks made transparent to all workers upon onboarding:

- **Anti-Slavery & Human Rights Policy:** Explicitly sets out corporate expectations regarding human dignity, fair compensation, and statutory working hour limitations.
- **Whistleblowing Policy:** Provides a secure, confidential pathway for any staff member, contractor, or vendor to immediately escalate suspicions of exploitation or labour abuse directly to executive leadership without fear of retaliation.
- **Dignity at Work & Recruitment Code:** Enforces fair, non-discriminatory workplace practices, ensuring equal opportunity and transparent labour agreements.

3. Due Diligence and Vendor Onboarding Processes

To eliminate human rights risks before they interface with our workflows, PATH MSC maintains clear check gates:

- **Right to Work Verification:** 100% of employees and independent technical consultants undergo mandatory UK Right to Work documentation checks prior to administrative account provisioning.
- **Direct Contracting:** PATH MSC contracts directly with individual workers or through highly vetted, reputable technical recruitment agencies.
- **Procurement Scrutiny:** We challenge any abnormally low service or consulting tenders to ensure that down market suppliers are not depressing costs through the exploitation of human capital.

4. Risk Assessment and Supply Chain Management

PATH MSC routinely reviews its operational profile to map potential risk vectors.

Given our tech centric business model, our direct operations are categorized as inherently low risk. However, we recognize that the hardware components powering the tech sector (laptops, monitors, server circuitry) carry geographic supply chain risks. We control this risk by sourcing corporate computing endpoints exclusively from authorized enterprise distributors who maintain their own verified, published Section 54 statements.

5. Monitoring Effectiveness & Key Performance Indicators (KPIs)

We measure the structural health and compliance of our organization against targeted, measurable performance goals:

- **KPI 1:** 0% occurrences of modern slavery, trafficking, or labour violations reported or discovered across PATH MSC operations.
- **KPI 2:** 100% of active employees and long-term contractors holding fully validated employment agreements matching or exceeding the UK National Living Wage baseline.
- **KPI 3:** 100% verification of UK Right to Work credentials cleared prior to day-one system resource allocation.

6. Training and Capacity Building

To ensure our zero-tolerance stance is integrated across daily operations, PATH MSC provides mandatory compliance instruction to all core personnel during onboarding.

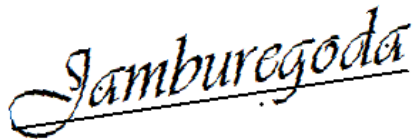
This awareness training ensures our software engineers, procurement leads, and line managers remain equipped to identify the warning signs of labour exploitation, protect remote working boundaries, and follow immediate internal escalation tracks directly to the executive board.

Board Approval & Sign-Off

This voluntary statement has been formally approved and adopted by the Board of Directors of PATH MSC and is reviewed on an annual basis to reflect changing regulatory requirements and operational updates.

Authorized Signatory:

Signed on behalf of PATH MSC:

A handwritten signature in black ink, reading "Jamburegoda", written in a cursive style. The signature is underlined.

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Jamburegoda Abeywickrama, Director

Date: January 2026