

Room Twelve Ltd – Modern Slavery Policy and Statement

Date: 15 December 2025

Approved by: Board of Directors, Room Twelve Ltd

Introduction

Room Twelve Ltd (“the Company”) is committed to conducting its business with integrity and in a manner that respects human rights. We have a zero-tolerance approach to modern slavery, including forced labour, human trafficking, and child labour.

This statement is made in accordance with the **Modern Slavery Act 2015** and outlines the steps Room Twelve Ltd takes to prevent modern slavery within its business and supply chains.

About Room Twelve Ltd

Room Twelve Ltd is a leasing organisation serving primarily public sector customers. Our operations are limited to financial leasing services; we do not manufacture, procure, or supply physical goods or equipment on behalf of our clients.

Key facts about our business:

- Business Type: SME
- Core activity: Leasing services only
- Customer base: Public Sector organisations who conduct their own procurement activities

Scope

While the risk of modern slavery is considered low within Room Twelve Ltd due to the nature of our business, we recognize our responsibility to:

- Ensure our business operations are free from modern slavery;
- Remain vigilant to potential risks in our business partners and service providers;
- Comply with all relevant public sector tender requirements, including those related to human rights and ethical standards.

This policy applies to all employees, directors, and any contractors engaged by Room Twelve Ltd.

Our Approach

Internal Policies and Procedures

- All employees are required to uphold the Company's Code of Conduct and Ethics.
- Employment contracts comply fully with UK employment law, including the right to work checks and fair treatment of staff.
- Training on modern slavery awareness is provided and updated periodically.

Supplier and Partner Engagement

- Although Room Twelve Ltd does not procure goods for customers, we ensure that any third-party suppliers or service providers engaged for operational support (e.g., IT, facilities, professional services) meet ethical standards.
- We include a clause in any supplier contracts requiring adherence to all relevant laws, including the Modern Slavery Act.

Risk Assessment

- We assess any potential modern slavery risk in our business operations and in our engagement with service providers.
- Given the nature of our services and limited procurement, we have determined the risk to be minimal.

Reporting and Accountability

- Employees are encouraged to report concerns regarding unethical behaviour, human rights violations, or suspected modern slavery through internal channels or anonymously if required.
- Reports are reviewed by the Board of Directors, and any necessary action is taken immediately.

Governance

The Board of Directors of Room Twelve Ltd has overall responsibility for ensuring compliance with this policy. Day-to-day implementation and monitoring are overseen by the Company Director.

Training and Awareness

- Staff receive training on modern slavery awareness and how to identify and escalate potential risks.
- Training is reviewed annually and updated to reflect legislative changes or emerging risks.

Continuous Improvement

Room Twelve Ltd is committed to regularly reviewing our policies, procedures, and supplier engagement practices to ensure ongoing compliance with the Modern Slavery Act 2015 and Public Sector framework requirements.

Statement Approval

This statement is approved by the Board of Directors of Room Twelve Ltd and will be reviewed and updated annually.

Signed:



Sophie Coles
Director, Room Twelve Ltd

Date: 15 December 2025