

Modern Slavery and Human Trafficking Policy

Last updated: 29 May 2026 · Version 2.0
Approved by the Chief Executive Officer · Reviewed annually

1. Purpose and commitment

Nimble Global Ltd ('Nimble Global', 'we', 'our' or 'us') is committed to acting ethically and with integrity in all our business dealings, and to doing what we reasonably can to ensure that modern slavery and human trafficking have no place in our operations or in the relationships through which we work.

Nimble Global is below the £36 million turnover threshold at which the UK Modern Slavery Act 2015 requires a slavery and human trafficking statement, so we are not legally obliged to publish one. We maintain this Policy voluntarily, because responsible conduct matters to us and because it reflects the very standards we help our clients uphold.

2. What we mean by modern slavery

In this Policy, 'modern slavery' covers slavery, servitude, forced or compulsory labour, and human trafficking, as defined in the Modern Slavery Act 2015. It describes situations in which a person is exploited, coerced, deceived or controlled for another's gain and is not free to leave.

3. Who this Policy applies to

This Policy applies to everyone who works for or on behalf of Nimble Global, including our people and any associates or contractors we engage. We also expect the suppliers and partners we work with to act consistently with it.

4. Our business and where risk sits

Nimble Global is a UK-registered specialist consultancy advising global organisations on contingent-workforce compliance, audit and governance. We are a small, focused team supported by specialist associates, and the suppliers we rely on directly are mainly professional and technology service providers, which carry a low inherent risk of modern slavery.

The more significant risk in our field lies not in our own operations but in the labour supply chains we advise on. Contingent and agency labour, particularly where it involves migrant or temporary workers moving through several tiers of suppliers, is a recognised higher-risk area for labour exploitation. Much of our work exists precisely to help clients bring visibility and control to those supply chains, and we regard that work as part of how we help prevent modern slavery, not as something separate from this Policy.

5. Our expectations of those we work with

We expect the suppliers, contractors and partners we engage to share our standards, including:

- employment that is freely chosen, with no forced, bonded or compulsory labour;
- no child labour;
- compliance with applicable employment, wage and working-hours laws;



- freedom of association;
- safe and healthy working conditions; and
- fair and non-discriminatory treatment.

Where we have concerns that a supplier or partner falls short of these standards, we will raise them and, if they are not addressed, reconsider the relationship.

6. Our approach

We take a proportionate, risk-based approach that reflects the size of our firm and the nature of our work. In practice, this means:

- considering modern slavery risk when we take on suppliers, partners and engagements, and giving closer attention where the risk is higher;
- reflecting our expectations in the way we contract and work with others;
- looking into any concern that is raised, and acting on what we find; and
- keeping our approach under review as our work and the relevant law develop.

7. Raising concerns

Anyone with a concern about modern slavery connected to Nimble Global, whether they work with us, supply us, or encounter our work, can raise it in confidence with the Chief Executive Officer at [insert confidential reporting email]. We treat such concerns seriously and in confidence, and no one will suffer disadvantage for raising a concern honestly and in good faith.

8. Governance and review

The Chief Executive Officer is accountable for this Policy and for ensuring it is communicated and applied. We review it at least once a year, and update it whenever our operations or the relevant law change.

9. Frameworks that inform this Policy

Although our direct obligations arise under UK law, our approach is informed by international standards, including the International Labour Organisation's core conventions, the UN Guiding Principles on Business and Human Rights, and the developing body of supply-chain due-diligence law in jurisdictions where we and our clients operate, such as Australia, Canada, the United States and the European Union.

Signed

David Ballew
Founder & Chief Executive Officer
Nimble Global Ltd