Modern Slavery Statement

Financial Year Ending 2026

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Subcontext Ltd has taken to ensure that modern slavery and human trafficking are not taking place in our business or supply chains.

We publish this statement voluntarily. It follows the structure and areas of content suggested for statements under Section 54, because our customers, many of whom are regulated firms with their own supply chain obligations, expect their suppliers to be open about these risks.

In this statement, "modern slavery" includes slavery, servitude, forced or compulsory labour and human trafficking, as defined in the Modern Slavery Act 2015.

Our Business

Subcontext Ltd is a software company providing an AI-powered conversational agent platform. We are registered in England and Wales (Company No. 17019645) with our registered office at 124 City Road, London, EC1V 2NX.

Our platform is used mainly by UK insurers, brokers and other regulated firms to talk to their own customers on web chat, SMS, WhatsApp, email and voice, and to manage leads, quotes, applications, policies and claims. We are a small founding team. Our work is knowledge work carried out by skilled staff, and we do not manufacture, import or distribute physical goods.

Our Supply Chain

As a software company, our supply chain primarily consists of:

- Cloud infrastructure providers (Amazon Web Services)
- AI model providers (AWS Bedrock, OpenAI, ElevenLabs)
- Communication service providers (Twilio, Meta)
- Payment processing providers (Stripe)
- Data and quoting services (Data8, Iress)
- Professional services (legal, accounting)

These are established technology companies with their own modern slavery policies and compliance programmes.

The full list of the suppliers that process data on our behalf, and where they do so, is published in our Sub-Processor List. We also buy computer equipment and everyday business services, which is where risks further down the supply chain are most likely to arise, for example in the manufacture of electronic devices.

Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. We:

- Pay all employees and contractors at or above the applicable living wage
- Do not use forced, bonded, or compulsory labour
- Verify the right to work of all employees
- Assess our supply chain for modern slavery risks proportionate to our business

These commitments are supported by our other policies:

Policy	How it helps
Whistleblowing Policy	Lets anyone who works with us raise concerns, including about modern slavery, with protection from unfair treatment
Supplier Risk Management Policy	Sets out how suppliers are selected, contracted with and monitored
Anti-Bribery & Corruption Policy	Prohibits bribery, which can be linked to labour exploitation and trafficking
Equality, Diversity & Inclusion Policy	Sets out fair treatment in recruitment, pay and working conditions

We do not charge recruitment fees to the people we hire, and we do not hold anyone's identity documents.

Due Diligence

Given the nature of our business (software as a service), our supply chain consists primarily of established technology companies. We assess modern slavery risk as low but remain vigilant and will take appropriate action if any concerns arise.

Our approach is proportionate to that risk:

- When we choose a new supplier, we consider whether the kind of goods or services, and where they come from, carry a higher risk of modern slavery
- For the main technology suppliers listed above, we review their published modern slavery statements or equivalent commitments
- When buying equipment, we favour established manufacturers and retailers that publish their own supply chain commitments
- Where we identify a higher-risk supplier, we will ask about their practices and expect them to address any concerns. If a supplier is unwilling to do so, we will stop using them where that is possible

Risk Assessment

Area	Risk	Reason
Our own team	Low	A small, skilled team, with right to work checks and pay at or above the applicable living wage

Area	Risk	Reason
Technology and cloud services	Low	Established providers with their own modern slavery programmes
Professional services	Low	UK-based regulated professions
Computer equipment	Medium	Electronics supply chains can involve labour exploitation in component manufacture

Training

Everyone who works for Subcontext is made aware of this statement and of how to raise a concern when they join. As we grow, people responsible for choosing suppliers will receive guidance on recognising the signs of modern slavery.

Measuring Effectiveness

We will judge how well our approach is working by:

- Whether right to work checks have been completed for everyone we hire
- Whether new suppliers have been considered for modern slavery risk when they are chosen
- The number of concerns raised and how they were resolved

Reporting

Anyone with concerns about modern slavery in our business or supply chain can report them to hello@subcontext.com.

Staff can also raise concerns under our Whistleblowing Policy. Anyone who believes someone is in immediate danger should call 999. The Modern Slavery and Exploitation Helpline (08000 121 700) also gives confidential advice.

Review and Approval

This statement is reviewed at least annually and was approved by the directors of Subcontext Ltd. It is effective from October 2026, and is owned by a director of Subcontext Ltd.

Subcontext Ltd, registered in England and Wales, Company No. 17019645. Registered office: 124 City Road, London, EC1V 2NX. The current version of this document is published at subcontext.com.