

Modern Slavery Statement 2025

1. About Public Digital

1.1 Overview

Public Digital is a specialist global management consultancy which focuses on advising governments, public and private sector institutions on digital, data and technology strategy and transformation.

It was founded by the team who created and scaled the UK's Government Digital Service (GDS) between 2010 and 2016. Collectively, our founders and wider team were instrumental in bringing agile, multidisciplinary and user-centred approaches into government for the first time, which took the UK to the top of the UN's e-government rankings and created a model that has been emulated globally.

Public Digital now has a multidisciplinary team of over 80 deep government digital experts from governments across the world, supported by a wider affiliate network of 300. Our mission is to improve the lives of people by bringing the world's most important institutions into the internet era.

We are respected globally as preeminent experts and thought leaders on government digital transformation and have worked with more than 30 governments around the world to bring vital public institutions into the internet era.

1.2 Services

We provide a broad range of consultancy services to large and complex clients, including:

- Helping institutions set and deliver transformative digital strategies.
- Setting up and scaling transformative digital institutions, and building the multidisciplinary capabilities of organisations to become more responsive and adaptive to their users' needs.
- Applying agile, iterative user-centric policy and service design to tackle extremely complex policy or services challenges, often in multi-agency, multi-stakeholder environments.
- Coaching senior leaders to successfully achieve transformation of their organisation.
- Helping organisations make more informed and sustainable technology choices often in the context of a legacy IT estate; including leading the global agenda around digital public goods and digital public infrastructure.

1.3 Ownership & Corporate Structure

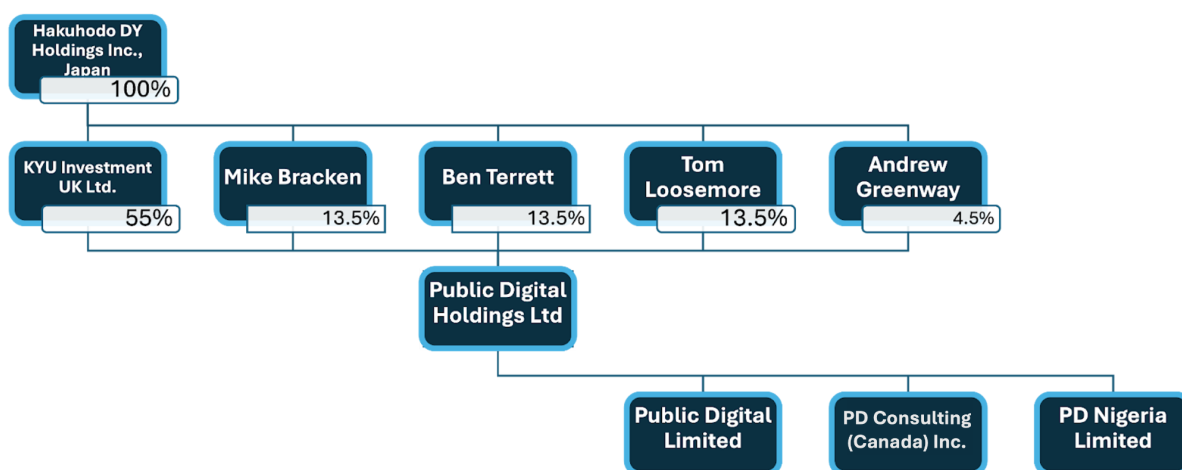
Public Digital is a private limited company headquartered in London, United Kingdom, with international operations supported through a small number of subsidiaries. We are a UK registered business operating within the UK's corporate governance framework including the

Companies Act 2006, and have a Board including experienced Non-Executive Directors with significant experience at large national institutions.

For the purposes of this statement, 'Public Digital' refers to the operations of the following entities:

- Public Digital Holdings Limited
- Public Digital Limited
- PD Consulting (Canada) Inc.
- PD Nigeria Limited

Our majority stakeholder is KYU Investment UK, and we are a member of the kyu collective of organisations. KYU Investment UK is wholly owned by Hakuholdo DY Holdings, which is a listed company on the Japanese stock exchange. Our founders, Ben Terrett, Mike Bracken, Tom Loosemore, and Andrew Greenway, hold a combined 45% stake in the company. For clarity we provide our corporate structure below.



1.5 Context

No incidences of modern slavery have been recorded or uncovered in our organisation during our trading history, but we remain vigilant and committed to monitoring risk.

Currently, Public Digital does not meet the definition of a “relevant commercial organisation” under the Modern Slavery Act 2015, as our annual turnover is below £36 million. We are therefore not legally required to produce a modern slavery statement.

However, we have chosen to publish this statement voluntarily to demonstrate Public Digital’s commitment to the principles of the Modern Slavery Act 2015, and to affirm our dedication to ethical business practices, transparency in our operations and supply chains, and the prevention of modern slavery and human trafficking in all its forms.

2. Statement of Commitment

2.1 Our Understanding

We understand and acknowledge the obligations set out in the UK Modern Slavery Act 2015, particularly the requirement under Section 54. Although Public Digital does not meet the threshold of a “relevant commercial organisation” under the Act, we are committed to upholding its principles and taking appropriate action to identify and address any risk of modern slavery in our operations and supply chains.

2.2 Our Position on Modern Slavery

Public Digital fully supports the aims of the Modern Slavery Act 2015. We recognise that modern slavery, human trafficking, and child labour are serious crimes and fundamental violations of human rights. We are committed to conducting our business ethically, with zero tolerance for any form of modern slavery or exploitation.

We insist on the same high standards from all those we work with — including employees, contractors, affiliate network partners, suppliers, and any other organisations providing services within our supply chain. We expect our partners to be aware of and comply with the requirements of the Modern Slavery Act wherever they operate.

As a growing company with an expanding global client base, we recognise that the risk of modern slavery is not static, and may evolve as our operations and supply chain develop. We are committed to ensuring that appropriate practices and mechanisms are in place to actively monitor risk and to enable prompt, decisive mitigating action wherever necessary.

3. Risk

Public Digital considers the overall risk of modern slavery within our organisation and supply chain to be low. This assessment is based on the nature of our operations, the sectors in which we operate, and the types of goods and services we provide and procure.

Our organisational and operational model focuses exclusively on the delivery of professional services through a directly employed workforce, supported by a trusted network of affiliate experts. We do not manufacture or supply physical goods, nor do we operate in high-risk sectors including those identified by the UK Government or the International Labour Organization (ILO), such as agriculture, construction, mining, or domestic work.

Specifically:

- We do not supply any goods that have been identified by the US Department of Labor as being at high risk of being produced by child labour or forced labour.
- We do not purchase any such goods.
- No part of our supply chain falls into the highest-risk categories outlined by the UK Government or the ILO.

4. Operations - Key Points

4.1 Governance

- All employees are provided with a code of conduct which makes explicit reference to human trafficking and modern slavery. Detecting and reporting of modern slavery is the responsibility of all those working for us or on our behalf.
- Public Digital has an Ethics Committee, chaired by our Non-Executive Board Chairman Tim Brooks, which all employees are able to attend and participate in. The Ethics Committee reviews any new business where an ethical or human rights concern has been raised (for example, in contracting with a foreign government). A report is produced to highlight potential areas of risk and an open discussion is had around consideration of these to determine whether the work is in keeping with our corporate values.

4.2 Recruitment & Employment

- We are a Real Living Wage accredited employer: all of our employees are paid the Real Living Wage and we make this requirement on our subcontractors.
- We have not identified any worker groups that are considered highly vulnerable.
- We do not use seasonal work, low skill or unskilled work, or hazardous work. We have employed temporary labour in the past but only in semi-skilled or skilled work and through established national recruitment firms, where we have reviewed their Modern Slavery Statements during due diligence.
- We do not use worker-paid recruitment fees (a common factor underpinning many aspects of modern slavery).
- We take a minimum of two references for all new hires and perform employment and identity checks in compliance with the Immigration, Asylum and Nationality Act 2006.
- All employees have access to a grievance mechanism and whistleblowing to provide channels to report likely violations.
- All employees have access to pastoral support through our employment practices, which may include a buddy, career coach and mentor. We also have an open culture where all colleagues and subcontracted affiliates are encouraged to write weeknotes about their work and life at PD to share with colleagues. This culture of openness and transparency provides a further cultural mechanism to identify potential signs of modern slavery.

4.3 Suppliers

- We map our Tier 1 supply chain. We have not identified any suppliers as being of high risk of modern slavery.
- Over 90% of our Tier 1 supply chain are UK-domiciled businesses. The majority are sole traders who are known to us and operate as highly skilled professional management consultants.

- Our due diligence processes assess, monitor and address the risks of modern slavery in all suppliers at multiple stages of the selection, purchasing and contracting processes (including in-life contract management).
- We avoid purchasing practices which put undue pressure on suppliers which can lead to poor recruitment practices, worker conditions or low pay; including aggressive pricing, late or extended payments; withdrawing from contracts without notice; excessive penalties for not meeting orders.

5. Approval and Review

This statement has been approved by senior management. It will be subject to annual review.

A handwritten signature in black ink, appearing to read 'B Terrett', with a stylized flourish at the end.

Ben Terrett, CEO
March 2025

A handwritten signature in blue ink, appearing to read 'Emma Gawen', with a stylized flourish at the end.

Emma Gawen, Managing Director
March 2025