Modern Slavery Statement

EcoVate Group

Document	Modern slavery and human trafficking statement
Organisation	Tenwell Innovations Limited trading as EcoVate Group
Financial year	Year ending 31st May 2026
Approved by	David de Wet, Managing Director
Version	v1.1
Date	31st July 2026

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1 Our commitment

1.1 Zero tolerance

1.1.1 EcoVate Group has zero tolerance for modern slavery, servitude, forced or compulsory labour and human trafficking in any part of our business, our supply chain or the work we deliver for clients.

1.1.2 We are committed to complying with the Modern Slavery Act 2015, as amended and supplemented by later legislation and statutory guidance, and to following best practice in identifying, preventing and eradicating modern slavery wherever we have influence to do so.

1.2 Status and scope of this statement

1.2.1 We publish this statement in line with section 54 of the Modern Slavery Act 2015 and report against the information described in section 54(5).

1.2.2 This statement covers EcoVate Group's consultancy services for the financial year ending 31st May 2026 and reports the steps we took during that year. We publish a new statement each financial year, within six months of the year end.

1.2.3 The standing rules that our people and suppliers must follow are set out in our Modern Slavery Policy, which we review whenever the law or our business changes. This statement reports how we applied that policy during the year.

2 Our organisation and supply chain

2.1 Our organisation

2.1.1 EcoVate Group is an independent consultancy specialising in procurement, energy and healthcare transformation with 27 employees.

2.1.2 Our clients are predominantly NHS trusts, integrated care boards and other public sector bodies. We provide procurement strategy and advisory support, strategic and tactical delivery support, transformation services, and specialist energy and facilities management design and procurement expertise. Our work is delivered by our own employed consultants, supplemented where needed by a small number of specialist associates.

2.1.3 Dotted Line, EcoVate Group's procurement software platform, is provided by Dotted Line App Ltd, which publishes its own modern slavery and human trafficking statement. The two statements share the same zero-tolerance commitment.

2.2 Our supply chain and where the risks lie

2.2.1 As a professional services business, our own supply chain is small and our direct exposure to modern slavery is low. We have assessed that conclusion rather than assumed it. Our main categories of spend are:

- specialist associates and subcontracted consultants;
- IT hardware, software and cloud services;

- professional services such as accountancy, legal, insurance and HR; and
- travel, accommodation and office services.

2.2.2 We assess the risk within our own operations as low because our work is professional services, delivered primarily from home by qualified consultants whom we employ directly. Risk is not zero, however, and the areas we monitor most closely are subcontracted or agency labour and the manufacture of IT equipment, where global supply chains carry known risks.

3 Our CIPS Corporate Ethics Mark

3.1 What the Ethics Mark requires

3.1.1 In November 2025 EcoVate was awarded the Chartered Institute of Procurement and Supply (CIPS) Corporate Ethics Mark, and we are listed on the CIPS Corporate Ethics Register. The Ethics Mark is independent recognition that an organisation meets international standards against criminal conduct in procurement and supply, including bribery, corruption, fraud and human rights abuse.

3.1.2 To achieve and keep the Ethics Mark, EcoVate:

- has adopted the CIPS Corporate Code of Ethics, which sits alongside our own Code of Conduct;
- requires every member of staff directly involved in procurement services to complete the CIPS Ethical Procurement and Supply eLearning and pass its three assessments; and
- renews the Ethics Mark every year, as each individual certificate is valid for one year only.

3.2 What the training covers

3.2.1 The CIPS eLearning and assessments cover three areas:

- human rights, including modern slavery, forced labour, exploitation and how to recognise them in supply chains;
- fraud, bribery and corruption, which are frequently used to enable and conceal labour exploitation; and
- environmental procurement, including responsible and sustainable sourcing.

3.2.2 This gives our procurement staff a tested, consistent understanding of the risks set out in this statement and how to respond to them. The Ethics Mark is next due for renewal in November 2026.

4 Our policies and our people

4.1 Our policies

4.1.1 Our commitment is embedded in our Modern Slavery Policy, our Code of Conduct and our standard form of employment contract, which apply to everyone working for or on behalf of EcoVate.

4.2 Recruiting and employing our people

4.2.1 In recruiting and employing our people, we:

- verify the right to work of every employee in line with local requirements;
- recruit directly, and use only reputable agencies that do not charge candidates fees;
- issue written contracts, pay at or above the Real Living Wage and applicable national minimums, and never withhold original identity documents (copies taken for right-to-work checks are held securely, as the law requires);
- apply clear policies on working hours and overtime, including pre-approval of additional hours; and
- encourage anyone to raise concerns, in confidence and without fear of reprisal, directly with a Partner.

5 Due diligence in our supply chain

5.1 Supplier due diligence

5.1.1 Our due diligence is proportionate to risk. Before appointing an associate, subcontractor or material supplier, we:

- confirm their right to work or legal status and check for any modern slavery convictions or exclusions;
- require written commitment to the Modern Slavery Act 2015 and to this statement, and a copy of their own statement where they are required to publish one;
- include contract terms that require compliance, allow audit and permit termination for breach; and
- review higher-risk suppliers at least annually.

6 Training and measuring effectiveness

6.1 Training

6.1.1 Every member of staff directly involved in procurement services completes the CIPS Ethical Procurement and Supply eLearning and assessments each year, as required

by our Ethics Mark (section 3). All staff are briefed on this statement and our Code of Conduct and the CIPS Corporate Code of Ethics when they join.

6.2 What we did during the year

6.2.1 During the financial year ending 31st May 2026 we:

- were awarded the CIPS Corporate Ethics Mark in November 2025 and adopted the CIPS Corporate Code of Ethics;
- had 18 of 18 staff directly involved in procurement services pass the CIPS Ethical Procurement and Supply assessments;
- completed due diligence on 3 new associates and subcontractors before appointing them; and
- identified no instance of modern slavery or human trafficking in our business or supply chain.

6.2.2 In the financial year ending 31st May 2027 we will:

- renew the CIPS Corporate Ethics Mark in November 2026;
- brief all staff on our Modern Slavery Policy;
- complete the Modern Slavery Assessment Tool; and
- review our associate and subcontractor terms so that they pass down the modern slavery obligations our NHS clients now include in their contracts.

6.3 Key performance indicators

6.3.1 We measure our effectiveness against the indicators in Table 1, which shows our targets and our results for 2025/26.

Table 1: Key performance indicators

Indicator	Target	2025/26 result
Staff directly involved in procurement services holding a current CIPS Ethics Test certificate	100%	100%
New associates and subcontractors completing due diligence before appointment	100%	100%
CIPS Corporate Ethics Mark maintained	Renewed annually	Awarded November 2025
Modern slavery concerns raised, and the action taken	Reported in full	None raised

7 Supporting our clients

7.1 Our role

7.1.1 We apply the same standards in the procurements we run and assure for clients. We help NHS clients in England to comply with the National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025 and help public sector clients apply PPN 009. This includes completing the pre-procurement risk assessment, building proportionate requirements into tenders and contracts, and advising on the response where a concern arises.

8 Approval

8.1 Approval and sign-off

8.1.1 This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and constitutes EcoVate Group's slavery and human trafficking statement for the financial year ending 31st May 2026. It was approved by the board of EcoVate Group on 31st July 2026 and is signed by a director. To the best of my knowledge and belief, the information in it is accurate. Our next statement will cover the financial year ending 31st May 2027 and will be published by 31st July 2027.

8.1.2 Concerns about modern slavery can be raised in confidence with Denise Phelan, Partner at info@ecovategroup.com, or with the Modern Slavery and Exploitation Helpline on 08000 121 700.

Signed: 

David de Wet
Managing Director, for and on behalf of EcoVate Group