



Modern Slavery Statement 2025



Executive Summary

Qnipay Limited stands firmly against modern slavery in all its forms. This statement, published voluntarily under Section 54(1) of the Modern Slavery Act 2015, outlines our commitment to preventing slavery, servitude, forced labour, and human trafficking throughout our operations and supply chains.

Operating across the United Kingdom, Nepal, and India, we recognise the heightened risks in regions where an estimated eleven million people in India and 97,000 in Nepal are affected by modern slavery. We are committed to continuous improvement in identifying, assessing, and addressing these risks.

1. Our Commitment

Modern slavery is a crime against humanity that we will not tolerate within our organisation or supply chain. We pledge to:

- Respect and protect the fundamental human rights of all workers.
- Maintain transparent and ethical business practices.
- Continuously improve our approach to identifying and mitigating risks.
- Hold ourselves and our partners accountable to the highest standards.

This commitment extends to all our companies Qniverse, QniPay and Whatnxt.

2. About Qnipay

Our Mission

Payroll shouldn't be complicated. Too often, it is.

We built QniPay to change that. By obsessing over every detail, we removed the friction and created payroll that is simple, reliable, and just works.

Our Values

Our values guide every aspect of our business, ensuring we remain people-focused while delivering exceptional service to our clients.

Our Structure

- **Parent Company:** Qniverse Limited (UK Company No: 13801688)
- **Subsidiary:** Qnipay
- **Registered Office:** Longcroft House, 2-4 Victoria Avenue, Liverpool Street, London EC2M 4NS
- **Global Presence:** United Kingdom, Nepal, India

Our Services

We deliver technology consulting and implementation through three specialised brands:

- **Qniversed** : Quality Assurance
- **Whatnxt**: Application development and integration solutions
- **Qnipay**: Payroll Solution

3. Supply Chain Overview

Our supply chain encompasses sixty-five suppliers across multiple categories:

- Technology hardware and infrastructure
- Software licensing partnerships
- Professional services contractors
- Facilities management services
- Recruitment agencies across our operational regions

Key Metrics

- **High-risk country suppliers**: 50% (45% Nepal, 5% India)
- **Tier 1 supplier assessment coverage**: 100%
- **Annual spend in Nepal/India**: Approximately £5 million

4. Risk Assessment Framework

We employ a comprehensive five-factor risk assessment model:

1. **Geographic Risk** – Based on Global Slavery Index ratings.
2. **Product/Service Risk** – Focusing on labour-intensive sectors.
3. **Workforce Vulnerability** – Including migrant workers and marginalised communities.
4. **Supplier Transparency** – Evaluating disclosure and cooperation.
5. **Governance Quality** – Assessing management systems and oversight.

Current Risk Profile

Critical Risk Areas:

- Recruitment agencies in Nepal
- Electronic hardware procurement chains

High Risk Areas:

- Facilities management contracts
- Remote worker oversight systems

5. Geographic Risk Analysis

India (Extreme Risk)

- Eleven million people affected by modern slavery.
- Significant challenges with bonded labour.
- Caste-based discrimination affecting vulnerable populations.
- Eighty-one percent acquittal rate in trafficking prosecutions.

Nepal (High Risk)

- 97,000 people in modern slavery.
- Major trafficking corridor to India and Gulf states.
- Recent progress: Liberation of 100,000+ Harawa-Charuwa bonded labourers.
- Economic vulnerabilities from 25% GDP remittance dependence.

United Kingdom (Medium Risk)

- UK nationals now constitute 25% of modern slavery referrals.
- Emerging risks in technology sector labour exploitation.

6. Sector-Specific Vulnerabilities

The technology sector presents unique challenges:

- **Cyber Slavery:** Trafficking for online criminal operations.
- **Hardware Supply Chains:** Links to forced labour in electronics manufacturing.
- **Complex Subcontracting:** Multiple tiers obscuring accountability.
- **Remote Work Risks:** Reduced visibility of working conditions.

7. Mitigation Strategies

Immediate Actions

- Enhanced due diligence for all critical risk suppliers.
- Implementation of worker voice mechanisms.
- Deployment of technology solutions for supply chain visibility.
- Zero-tolerance enforcement of ethical recruitment practices.

Ongoing Initiatives

- Regular risk assessments and supplier audits.
- Continuous monitoring of high-risk operations.
- Partnership with local organisations for ground-level insights.
- Investment in supplier capacity building.

8. Training and Awareness

2024–2025 Completed Training

- **All Employees:** 2-hour modern slavery awareness programme.
- **Procurement Team:** 4-hour supplier risk assessment training.
- **Management:** 3-hour training on exploitation indicators.
- **HR Team:** 6-hour ethical recruitment certification.

2025–2026 Training Pipeline

- Supplier education programme launch.
- Advanced training for high-risk location managers.
- Board-level strategic workshops.
- Worker awareness programmes in local languages.

9. Governance and Accountability

Oversight Structure

- Board-level accountability for modern slavery prevention.
- Quarterly progress reviews by senior leadership.
- Annual independent assessment of programme effectiveness.
- Clear escalation procedures for identified risks.

Reporting Mechanisms

- Confidential whistleblowing hotline.
- Multi-language reporting options.
- Protection for reporters from retaliation.
- Regular communication of outcomes and actions taken.

10. Progress Targets

2025–2026 Objectives

- Expand risk assessment to 75% of suppliers by spend.
- Launch direct worker feedback mobile application.
- Establish worker committees in all operational locations.
- Implement AI-powered continuous risk monitoring.

Three-Year Vision (by 2028)

- Achieve 100% supplier risk assessment coverage.
- Eliminate all recruitment fees across operations.
- Attain industry-leading worker satisfaction scores.
- Prepare for anticipated mandatory due diligence legislation.

11. Transparency and Reporting

We commit to:

- Annual publication of this statement with measurable progress updates.
- Quarterly internal reviews shared with stakeholders.
- Open dialogue with NGOs and industry partners.
- Honest acknowledgment of challenges and learnings.

12. Board Approval

The Board of Directors of Qniverse has approved this Modern Slavery Statement. We recognise that combating modern slavery requires sustained commitment, continuous improvement, and collective action.

Approved and signed:

Utshah Sharma

Chief Executive Officer

Qnipay

Date: 1st August 2025

For questions regarding this statement or our modern slavery prevention efforts, please contact: **support@qnipay.com**

Appendix: Key Definitions

Modern Slavery: Encompasses slavery, servitude, forced labour, debt bondage, and human trafficking.

Bonded Labour: Work demanded as repayment for a loan where terms prevent the debt from being paid off.

Debt Bondage: Status arising from a pledge of personal services as security for debt.

Harawa-Charuwa: Traditional bonded labour system in Nepal, now legally abolished.

Scheduled Castes/Tribes: Officially designated groups in India entitled to special protection due to historical discrimination.