



Modern Slavery and Human Trafficking Statement

TomCRM Limited

Period covered: 22 July 2025 to 30 September 2026
TomCRM-POL-001 Rev 1 | Issued 15 October 2026

Public document. Published at <https://www.tomcrm.co.uk/documents/modern-slavery-statement.pdf>.

Modern Slavery and Human Trafficking Statement

Document control	
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Title	Modern Slavery and Human Trafficking Statement
Revision	Rev 1 (replaces the handwritten Rev 0 statement of 22 July 2025)
Date of issue	15 October 2026
Period covered	22 July 2025 to 30 September 2026, and TomCRM's commitments for the following 12 months
Approved by	The board of directors of TomCRM Limited (Rev 0 on 22 July 2025; Rev 1 on 15 October 2026)
Owner	Tommy Findlay, Director (tommy@is3.co.uk, 01522 287318)
Review	At least annually, and whenever TomCRM's business or principal suppliers change. Next review due by 15 October 2027
Published at	https://www.tomcrm.co.uk/documents/modern-slavery-statement.pdf

Revision history

Revision	Date	Change
Rev 0	22 July 2025	First statement, handwritten and signed by the directors
Rev 1	15 October 2026	Rewritten in full in line with the Home Office statutory guidance; supplier table and published links added; issued under TomCRM document control

1. Introduction

This statement sets out the steps TomCRM Limited takes to prevent modern slavery and human trafficking in its business and supply chains. TomCRM's turnover is below the £36 million threshold in section 54 of the Modern Slavery Act 2015, so the statement is voluntary. We publish it because our customers, including public sector and education customers, need to know where their suppliers stand, and because we support the aims of the Act.

TomCRM first set out its position in a short statement signed by its directors on 22 July 2025. This revision replaces it with a fuller statement that follows the Home Office statutory guidance and covers the period since that first statement.

TomCRM has a zero tolerance approach to modern slavery, servitude, forced or compulsory labour and human trafficking, in its own business and in the businesses it buys from.

2. Our structure and business

TomCRM Limited is a company registered in England and Wales under number 15662063, with its registered office at 128 City Road, London EC1V 2NX. It is owned in equal shares by iS3 Ltd and TS Ltd, and it is run from Lincolnshire.

TomCRM provides a CRM and marketing automation platform to UK small and medium-sized businesses on a monthly subscription, together with setup, configuration and support.

The work is done by a small team based in the UK, with the technical work carried out by TomCRM's two founders through their own companies. TomCRM does not make, store or distribute physical goods, and it does not use agency or outsourced labour.

3. Our supply chain

Our supply chain is almost entirely digital: software, cloud hosting and professional services. The principal suppliers, and where to find their own published positions, are listed below.

Supplier	What it provides to TomCRM	Location	Its published position
HighLevel Inc.	The CRM and automation software on which the TomCRM platform runs	United States	HighLevel is not subject to section 54 and has not published a modern slavery statement. Its terms, data processing addendum and sub-processor list are published at: https://www.gohighlevel.com/terms-of-service https://www.gohighlevel.com/data-processing-agreement https://www.gohighlevel.com/sub-processors
Google (Google Cloud, Google Workspace)	Hosting for the HighLevel platform; TomCRM's own email and documents	Global	2025 Statement Against Modern Slavery: https://sustainability.google/reports/2025-google-statement-against-modern-slavery/
Amazon Web Services	Hosting for the HighLevel platform	Global	Amazon Modern Slavery Statement: https://sustainability.aboutamazon.com/modern-slavery-statement.pdf
Make.com (Celonis), Supabase, Hetzner Online, Anthropic, Stripe	Integrations, backup storage, Ai assistance and payment processing	UK, EU and United States	Software and cloud services delivered by skilled staff; covered by the annual supplier review in section 5
iS3 Ltd and TSLTD Limited	Configuration, development, sales and support work for TomCRM, carried out by TomCRM's founders through their own companies	United Kingdom	Bound by the commitments in this statement

Our main supplier, HighLevel Inc., is a United States company and does not publish a statement under the UK Act. The infrastructure HighLevel runs on is provided by Google and Amazon Web Services, both of which publish annual modern slavery statements covering their hardware and data centre supply chains, which is where the residual risk in a software supply chain sits.

4. Risk assessment

We assess the risk of modern slavery in our own operations as low. The people who work for TomCRM are a small team based in the UK, doing skilled professional work.

We assess the risk in our supply chain as low to medium. The software and professional services we buy carry a low risk. The higher risk lies further down the chain, in the manufacture of servers, network equipment and the devices we use, which we do not buy directly. We address that by relying on large cloud providers that publish modern slavery statements.

5. Policies and due diligence

TomCRM commits to the following:

- Anyone who works for TomCRM, directly or through a contractor, is paid at least the National Living Wage and has the right to work in the UK.
- Every supplier that provides a service to TomCRM or processes data for it is reviewed before it is engaged, and the list of suppliers is reviewed at least once a year, alongside the sub-processor list in our Data Processing Agreement (TomCRM-DPA-001). We completed a full review of our suppliers in September 2026.
- Where a supplier publishes a modern slavery statement, we check it is current when we review the supplier.
- If we find evidence that a supplier is involved in modern slavery or human trafficking, we will raise it with the supplier, report it to the relevant authorities where appropriate, and end the relationship if the supplier does not put it right.
- Anyone, inside or outside TomCRM, can raise a concern in confidence with Tommy Findlay, Director, at tommy@is3.co.uk or on 01522 287318, without fear of reprisal. Concerns can also be reported to the Modern Slavery and Exploitation Helpline on 08000 121 700.

6. Training and awareness

TomCRM's directors are familiar with the Modern Slavery Act 2015 and the Home Office statutory guidance, Transparency in Supply Chains: A Practical Guide. Anyone who joins TomCRM will be briefed on this statement and on how to raise a concern.

7. Measuring effectiveness

We will track and report the following in each annual review of this statement: the annual supplier review completed and its date; the number of new suppliers reviewed before engagement; the number of concerns raised and how each was resolved; and any changes to our business or supply chain that affect our risk assessment. No concerns were raised in the period covered by this statement.

8. Approval

This statement is made under section 54(1) of the Modern Slavery Act 2015 on a voluntary basis. This revision was approved by the board of directors of TomCRM Limited on 15 October 2026, replacing the statement the directors signed on 22 July 2025, and is published at <https://www.tomcrm.co.uk/documents/modern-slavery-statement.pdf>.

Signed for and on behalf of TomCRM Limited

Name: Tommy Findlay

Position: Director

Signature:

Date: 15 October 2026