

Modern Slavery & Human Trafficking Policy

Smart Supplier Technologies Limited

Last updated: April 2026

Approved by: Board of Directors

1. Our Commitment

Smart Supplier Technologies Limited (“the Company”) is committed to preventing modern slavery and human trafficking in all our business activities and supply chains. We take a **zero-tolerance approach** to slavery, servitude, forced or compulsory labour, child labour, and human trafficking.

We are committed to acting ethically, transparently, and with integrity in all our business relationships, and to implementing effective systems and controls to reduce the risk of modern slavery occurring within our organisation or supply chain, in line with the **Modern Slavery Act 2015**.

2. Our Business and Supply Chains

Smart Supplier Technologies Limited is a UK-based software company providing technology solutions and services to support supplier management, compliance, and procurement functions.

Our operations are primarily office-based and digital in nature. While the software and technology sector is generally considered **lower risk** for modern slavery, we recognise that risks may still arise through third-party suppliers, contractors, and service providers, including (but not limited to):

- Cloud hosting and IT infrastructure providers
- Professional services and consultancy
- Marketing and digital services
- Office services and outsourced support

We are committed to continuous improvement in understanding and managing these risks.

3. Legal Compliance

We support the objectives of **section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015**, which requires qualifying organisations to publish an annual modern slavery statement setting out the steps taken to prevent modern slavery in their business and supply chains.

Where applicable, our Modern Slavery Statement will be:

- Approved by the Board of Directors

- Signed by a Director
- Published on our website with a clear link from the homepage

4. Policies and Governance

To support our commitment, the Company operates the following policies and controls:

- This Modern Slavery & Human Trafficking Policy
- A Code of Conduct setting out expected standards of ethical behaviour
- Whistleblowing procedures allowing concerns to be raised confidentially
- Fair recruitment and employment practices in line with UK employment law

This policy applies to all employees, directors, contractors, consultants, agency staff, suppliers, and any other parties working on behalf of the Company.

5. Due Diligence and Risk Management

We take a proportionate, risk-based approach to managing modern slavery risks in our supply chain, consistent with UK Government guidance.

Our measures may include:

- Assessing suppliers based on the nature of services provided and geographic location
- Expecting suppliers and partners to comply with all applicable labour, employment, and human rights laws
- Including modern slavery and ethical conduct clauses within contracts where appropriate
- Reviewing supplier practices where risk indicators are identified

We recognise that identifying risk is a sign of effective due diligence, not failure, and we aim to be transparent about risks and improvements.

6. Reporting Concerns

All employees and workers are encouraged to report any concerns, suspicions, or knowledge of modern slavery or human trafficking connected to our business or supply chain.

Reports can be made:

- Via line management
- Directly to a Director
- Through the Company's whistleblowing arrangements

Reports will be taken seriously, investigated promptly, and handled confidentially unless disclosure is required by law. No individual will suffer detriment for raising concerns in good faith.

7. Training and Awareness

We are committed to ensuring appropriate awareness of modern slavery risks across the business. Training may be provided to relevant employees, particularly those involved in procurement, supplier management, or contract oversight, to help them:

- Understand modern slavery risks
- Identify warning signs
- Know how to raise concerns

8. Breach of Policy

Any breach of this policy by employees or contractors may result in disciplinary action, up to and including dismissal or termination of contract.

Where breaches are identified in our supply chain, we reserve the right to:

- Require corrective action
- Suspend or terminate relationships
- Report matters to relevant authorities where appropriate

9. Continuous Improvement

Smart Supplier Technologies Limited is committed to continuous improvement in our approach to preventing modern slavery. We will:

- Review this policy regularly
- Monitor emerging risks and guidance
- Update our practices as the business and regulatory expectations evolve

10. Responsibility

Responsibility for this policy and its implementation sits with the **Board of Directors**, with day-to-day oversight delegated to senior management.