

## MODERN SLAVERY STATEMENT

The Modern Slavery Act 2015 requires commercial organisations to publish an annual statement if certain criteria apply. Although Smart CT does not meet all the criteria to make this Modern Slavery Statement a regulatory requirement, Smart CT wishes to make public its direction on this topic.

Smart CT and its subsidiaries and controlled entities – including Smart CT GmbH are committed to treat all individuals with respect and dignity, ensuring safe working conditions, and operating ethically. with the environment by operating in an environmentally responsible manner.

### Our Policies

Smart CT supports the Sustainable Development Goal 8 *Decent Work and Economic Growth* and promotes supportive working environment, fundamental to protecting the safety of our staff, and expects all staff to promote similar expectations in their interactions with our external stakeholders.

Our ESG (Environmental Social Governance) Policy states explicitly that we promote responsible supply chain management and perform regular assessment of our Tier 1 suppliers. This includes a modern slavery assessment.

Our Code of Conduct is clear that all Smart CT staff, business collaborators and consultants are expected to:

- be a trusted community member and do the right thing when we conduct our business or engage with our local community. Each of us can play a role in the identification, prevention, and elimination of human rights abuses, such as child labour, human trafficking and forced labour. We achieve this by maintaining an open-minded, ethical stance and respecting diversity, local cultures, and customs to make a positive impact wherever we operate and by reporting concerns to senior management.
- be diligent in selecting our business partners and advisers.
- use the speak up channels provided to request guidance or raise concerns.

### Our Supply Chain

Our Supplier Code of Conduct makes explicit to our suppliers that they must:

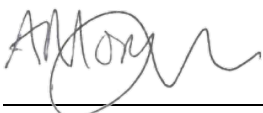
- prohibit the use of all types of slavery and forced and bonded labour and give workers, whether local or migrant, the right, and the ability to leave employment when they choose.
- provide evidence that they have implemented due diligence procedures to manage ethical issues within their supply chain, including all labour-related processes to ensure they comply with laws on slavery and human trafficking.

Our subcontractors are required to sign up to our Anti-slavery and Human Trafficking Laws clause. Anti-slavery and Human Trafficking breaches are material breaches sanctioned with contract termination.

### Training

Smart CT continues to enhance its training offering and in 2024 it will develop and introduce a training module to support our employees and collaborators to spot and respond to the signs of slavery and human trafficking.

Compliance with this Statement is mandatory through aligning Smart CT processes and people behaviours to the commitment above.

Signed:		Name:	Andy Morgan
Date:	21/05/2024	Position:	CEO