

MODERN SLAVERY STATEMENT

This statement applies to Smart CT Limited, its subsidiaries and controlling entities.

INTRODUCTION

Smart CT is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We recognize our responsibility to uphold the highest ethical standards and to act with integrity in all our business dealings, including our supply chain.

As an equal opportunities' employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff, ensuring safe working conditions and operating in an ethical manner.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard them from abuse, harassment or coercion.

OUR BUSINESS

Smart CT is a critical technology infrastructure business, providing comprehensive lifecycle services to large IT organisations such as Managed Service Providers, System Integrators and IT Manufacturers. Our services help organisations deploy and maintain technology across Networking, Server and Storage and Workplace Technologies, helping businesses to keep their technology connected.

OUR POLICIES

Smart CT supports the Sustainable Development Goal 8 Decent Work and Economic Growth and promotes a 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 assessments of our Tier 1 suppliers. This includes a modern slavery assessment.

CODE OF CONDUCT

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.

SUPPLIER CODE OF CONDUCT

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.

WHISTLEBLOWING POLICY

We encourage employees and suppliers to report any concerns about unethical behaviour or practices, including modern slavery, through our whistleblowing channels.

DUE DILIGENCE PROCESS

We conduct thorough due diligence on our supply chain to identify and assess potential risks related to modern slavery.

OUR COMMITMENT

We are committed to continuously improving our practices to combat modern slavery. We will review and update our policies and procedures regularly to ensure they remain effective.

This statement will be reviewed and updated every year.

Signed: 

Andy Morgan, CEO on
behalf of the Board of
Directors

Date: 3rd June 2025