

SMARTER TECHNOLOGIES MODERN SLAVERY STATEMENT

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Smarter Technologies Group Limited's Slavery and Human Trafficking Statement for the financial year ended 31 December 2018. This statement covers the activities, which procure goods and services from and form part of Smarter Technologies Group Limited's supply chain.

Our Supply Chain

Smarter Technologies Group Limited is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains, and to acting ethically and with integrity in all its business relationships.

Smarter Technologies Group Limited uses a wide range of suppliers who supply goods for sale, provide services and support our operations.

Due Diligence

We continually monitor suppliers we believe present high modern slavery risks in our supply chain. This includes those who support the procurement of goods and materials, particularly where goods and materials are acquired from suppliers in countries deemed as high risk.

All suppliers which we class as high risk must:

on an annual basis and prior to sourcing, provide full detail of the supply chains they are proposing to commission goods from on behalf of Smarter Technologies Group Limited.

Should a supplier fail to provide the information requested or to meet Smarter Technologies Group Limited's expectations, Smarter Technologies Group Limited will take appropriate action, which may include not entering into a relationship or terminating the relationship with the supplier concerned.

Training

During the year, we have continued to provide advice and guidance to those teams who have direct responsibility for relevant supply chains.

Looking Ahead

Over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

Ed Walker

Director