STG Anti-Slavery Policy

Documentation History

Author	Update by	Version	Date
Bid Manager	Elaine Glock	V0.1	30/07/2020
General Counsel	Matt Hunt	V1.0	09/05/2022
Ed Walker	Director	V1.1	09/05/2023
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Introduction

Modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing procedures to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Organisation Structure

Smarter Technologies Group Limited is a limited company registered in England and Wales, with Company Registration number 12075211.

Our Business

A leading solutions provider utilising in-house expertise in hardware, SaaS and Big Data. As owners of the Orion IoT communications network, we deliver end-to-end, cutting-edge solutions for our clients. Our digital transformation division supports public and private sector organisations throughout their journeys to the cloud and connected technology. With our industry-leading tools and expertise, we equip public services and private businesses to deliver citizen- and customer-centred services. To find out more about Smarter Technologies Group Limited, please visit www.smartertechnologies.com

The parts of our business and supply chain where risks of modern slavery are highest

In order to provide services to our clients we work with a range of suppliers including, but not limited to, professional service firms, utility suppliers, IT vendors, consultants, industry business partners and technology platform providers.

Our Policy on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships and in relation to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We also make sure our suppliers are aware of our policies and adhere to the same high standards.

Due Diligence Processes in place to manage and prevent risks of modern slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we have in place systems, due diligence processes and procedures to:

- Mitigate the risks in recruitment (through our recruitment and vetting policies). We conduct eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Identify, assess and monitor potential risk areas in our supply chains.

Reduce the risk of slavery and human trafficking occurring in our supply chains; and

- Encourage and protect whistle blowers.

Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain to comply with our values. For example, if we find evidence of a failure to comply with our policies which contain or reflect anti-slavery measures, we will immediately seek to terminate our relationship with the relevant supplier.

Training and capacity building of staff around modern slavery

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide regular training to our staff.

Our effectiveness in Combating Slavery and Human Trafficking

We intend to use key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. This statement is made pursuant to section 54(I) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current financial year.

Adherence to local and national laws

STTL make sure that it adheres to all laws in place be they National or local to location of work being carried out.

Freedom of workers to terminate employment

All employees have the right to terminate their employment should they so desire, with a four week notice period. As stated within their contract of employment

Freedom of movement

All STTL employees have freedom of movement to work where they are required to do so, be it in the office or at a customers site where work is being carried out.

Freedom of association

All STTL have the right to join a trade union, to engage in free speech or to participate in debating societies, political parties, or any other club or association, including religious denominations and organizations, fraternities, and sport clubs and not to be compelled to belong to an association should they choose to do so.

Prohibits any threat of violence, harassment and intimidation

STTL states within its equal opportunities policy that ALL behaviour such as Violence, Threats and Intimidation are not acceptable and depending on the severity will result in a written warning with training for improvement to be provided or the termination of employment.

Prohibits the use of worker-paid recruitment fees

STTL does not make its Workers recruitment fees or other related fees for their employment.

Approved by the board of directors (or equivalent management body)

STTL can confirm that the Modern Slavery documentation has been approved by the board of Directors.

Accessible via a prominent place on web site homepage

Our Anti – Slavery Policy can be found with our statement on the front page of our company website – www.smartertechnologies.com

Policy reflecting modern slavery

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Ed Walker

Director, Smarter Technologies Group Limited

Smarter Technologies

CYBER ESSENTIALS

Microsoft Silver Partner

IASME Consortium

Crown Commercial Service Supplier

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