

# Modern Slavery Policy

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## Introduction and Purpose

The Software Bureau Ltd is committed to preventing modern slavery and human trafficking in all areas of its business and supply chains. This policy sets out the standards expected of everyone working for, or on behalf of, the Company and supports compliance with the Modern Slavery Act 2015.

Modern slavery includes slavery, servitude, forced or compulsory labour, human trafficking, debt bondage, child labour and any other form of exploitation that deprives a person of their freedom, dignity or fundamental rights.

The Company takes a zero-tolerance approach to modern slavery and expects all employees, workers, suppliers and business partners to act ethically, transparently and with integrity.

## Intended readership

All staff and other interested parties.

<i>Relevant Document History</i>		
Action	Actioner	Date
Document Created	Martin Rides	22/6/2026
Approved	David Carter	23/6/2026

## Scope

This policy applies to all people working for, or on behalf of, The Software Bureau Ltd in any capacity. This includes employees, directors, officers, contractors, agency workers, consultants, temporary workers, suppliers, subcontractors, third-party representatives and business partners.

The policy applies to all Company operations and to the procurement of goods and services, whether supplied directly or through an extended supply chain.

## Policy Statement

The Software Bureau Ltd prohibits the use of modern slavery in any part of its business or supply chains. The Company will not knowingly support, engage with or benefit from any organisation or individual involved in slavery, servitude, forced or compulsory labour, human trafficking or other forms of exploitation.

The Company is committed to maintaining appropriate systems and controls to identify, assess and manage modern slavery risks. This includes fair recruitment practices, right-to-work checks, supplier due diligence, contractual expectations and clear reporting routes for concerns.

## Responsibilities

**Upper Management:** Upper Management has overall responsibility for ensuring this policy is implemented, maintained and reviewed. It is responsible for promoting a culture of compliance and ensuring that appropriate resources are available to manage modern slavery risks.

**Managers:** Managers are responsible for ensuring that those within their teams understand this policy and follow relevant procedures, particularly in relation to recruitment, procurement, supplier engagement and the reporting of concerns.

**Employees and workers:** All employees and workers must read, understand and comply with this policy. They are expected to remain alert to modern slavery risks and report any concern or suspicion promptly.

**Suppliers and business partners:** Suppliers, contractors and other third parties are expected to comply with this policy, follow applicable laws and maintain equivalent standards within their own operations and supply chains.

### Due Diligence and Risk Management

The Company will take a risk-based approach to identifying and managing modern slavery risks. Due diligence may include assessing supplier risk, reviewing supplier policies, seeking contractual assurances, monitoring performance and taking appropriate action where concerns are identified.

Higher-risk suppliers, services or jurisdictions may be subject to enhanced checks. The Company may refuse to work with, suspend or terminate relationships with suppliers or partners that fail to meet expected ethical standards or do not address identified concerns.

### Recruitment and Employment Practices

The Company will conduct recruitment and employment practices in a fair, lawful and transparent manner. All employees must provide evidence of their right to work in the UK before employment begins. Where an individual has temporary permission to work, the Company will carry out follow-up checks before that permission expires.

The Company will not knowingly use recruitment practices that involve worker-paid recruitment fees, withholding of identity documents, coercion, deception, excessive working hours or any restriction on a person's freedom to leave employment in accordance with the law.

### Supplier Standards

The Company expects suppliers and business partners to maintain high ethical standards and to comply with all applicable employment, labour, human rights and anti-slavery laws. Suppliers must not use forced labour, trafficked labour, child labour, bonded labour or any other exploitative labour practice.

Where appropriate, the Company may require suppliers to confirm compliance with this policy, cooperate with reasonable due diligence requests and notify the Company promptly if they become aware of modern slavery risks affecting goods or services supplied to the Company.

### Training and Communication

The Company will communicate this policy to relevant employees, workers, suppliers and business partners. Training or guidance will be provided where appropriate, particularly for employees involved in recruitment, procurement, supplier management or contract management.

The purpose of training is to help individuals understand what modern slavery is, recognise potential warning signs, understand their responsibilities and know how to report concerns.

## Reporting Concerns

Anyone who suspects that modern slavery, human trafficking or unethical labour practices may be taking place within the Company, its supply chains or any business relationship must report the concern as soon as possible.

Concerns should be raised with a line manager, a member of the Senior Management Team or through any applicable internal reporting or whistleblowing process. The Company will take all reports seriously and will handle them sensitively and, where possible, confidentially.

No employee or worker will suffer detrimental treatment for raising a genuine concern in good faith, even if the concern is later found to be mistaken.

## Breaches of this Policy

Any employee who breaches this policy may be subject to disciplinary action, up to and including dismissal. The Company may terminate its relationship with suppliers, contractors or business partners where they breach this policy, fail to cooperate with due diligence, or do not take appropriate action to address identified risks.

## Monitoring and Review

The Company will monitor the effectiveness of this policy and associated controls on an ongoing basis. This may include reviewing supplier due diligence, assessing reported concerns, considering changes in risk exposure and updating procedures where necessary.

This policy will be reviewed at least annually, or sooner if required by changes in law, regulation, business activities, supply chain arrangements or identified risk.