

Anti-slavery & Anti-Human Trafficking Policy

The Board at Smartcomm recognises the corporate responsibilities that our customers, staff, and other stakeholders rightly expect us to adopt with regard to Anti-slavery and human trafficking. This means ensuring that our business, contractors, and those of our immediate suppliers, operate to the highest standards, and that we use our influence to ensure that our supply chain meets our strict criteria.

Compliance with the Law

This policy applies to all persons working for Smartcomm or on our behalf in any capacity, including employees at all levels, directors, managers, seconded workers, contractors, and suppliers. Smartcomm Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection, and reporting of modern slavery in any part of Smartcomm or supply chain is the responsibility of all those working for us or on our behalf. Employees must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require:
 - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct.
 - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code.
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

Right To Work

In line with the Immigration, Asylum and Nationality Act 2006 all employees are subjected to a vetting process to ensure their eligibility to work in the UK.

- Identity check

Verify copies of two of the following documents:

- Valid passport
- Full birth certificate issued in UK
- Permanent National Insurance card showing NI number P45/P60
- Driving licence
- 2 utility bills showing current name and address (cannot accept mobile phone bill)

Eligibility to work in the UK

- Verify original and keep copy of one of the following documents:
- A passport showing that the holder is a British citizen or has the right of abode in the United Kingdom.
- A document showing that the holder is a national of a European Economic Area country* or Switzerland. This must be a national passport or national identity card.
- A residence permit issued by the United Kingdom to a national from the European Economic Area country or Switzerland.
- A passport or other document issued by the Home Office which has an endorsement stating that the holder has a current right of residence in the United Kingdom as the family member of a national from a European Economic Area country or Switzerland.
- A passport or other travel document endorsed to show that the holder can stay indefinitely in the United Kingdom or has no time limit on their stay.
- A passport or other travel document endorsed to show that the holder can stay in the United Kingdom; and that this endorsement allows the holder to do the type of work the employer is offering if they do not have a work permit.
- An Application Registration Card issued by the Home Office to an asylum seeker stating that the holder is permitted to take employment.
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Communication

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary via toolbox talks. Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request. This policy statement will be reviewed and published annually.

Signed:



Steven Worrell
Managing Director
02 January 2025