

# MODERN SLAVERY ACT 2015: Slavery and Human Trafficking Statement

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HR Department

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## INTRODUCTION FROM THE BOARD

Sword IT Solutions is committed to acting ethically and with transparency in all our business operations and practices. We ensure controls are in place so that all our employees, business partners and extended supply chain are treated with respect and integrity and that we do not engage directly or indirectly with slavery or human trafficking.

We are proud of the steps we have taken and our commitment to improving our practices to combat slavery and human trafficking. This statement outlines our understanding and the actions we have taken to eliminate all modern slavery risks within our own business and our supply chains.

## OUR BUSINESS

Sword IT Solutions works to design, deploy, and maintain business technology solutions that address our customers' challenges. We run projects, and manage services for customers across multiple business sectors. We are always driven by the needs of our customers when maintaining operational activities and managing change.

We have been successfully delivering services to our customers for over 30 years. From our offices in Aberdeen, Glasgow, London, Rijswijk (Netherlands), and Houston (USA), our team of professionals combine their IT, data and digital experience with domain understanding. Sword IT Solutions is part of the Sword Group, an international software and services organisation with more than 2,000 employees operating in over 20 countries.

## OUR SUPPLY CHAINS

As a provider of professional Digital, Technology and IT services, a complex supply chain does not exist within our organisation. Sword IT Solutions will not support or deal with any other business involved in slavery or human trafficking.

DOC. REF.	VERSION	VERSION DATE	AUTHOR	REVIEWER	APPROVER	CLASSIFICATION
HR-POL-031	3	29/06/2023	SWINBURN Craig	FROUD-WILLIAMS Catherine	SWINBURN Craig	Public

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## OUR POLICIES 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. We operate the following policies and principles, in addition to publishing our Core Values, that describe our approach to the identification of modern slavery risks and steps to be taken to prevent human slavery and human trafficking in our operations:

**Whistleblowing policy:** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it clear and easy for employees to make disclosures, without fear of retaliation.

**Anti-Bribery Policy:** Our policy reflects our commitment to acting ethically and with integrity in all our business relationships and makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour through our actions and in managing our supply chain. We are committed to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

**Supplier/Procurement Conduct:** We have a zero-tolerance policy to working with anyone that is involved in any illegal or unethical conduct.

**Corporate Responsibility:** Our website highlights our latest corporate responsibility reports:

[Corporate Responsibility - Sword Group \(sword-group.com\)](https://www.sword-group.com/corporate-responsibility)

## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we;

- When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistleblowing.
- We conduct relevant checks before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.
- We review the potential for risk at regular intervals, including the possibility of reauditing a supplier or conducting spot checks.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

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## SUPPLIER ADHERENCE TO OUR CORE VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our Core values and ethics, we have in place a supply chain compliance programme.

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We require the businesses we work with to abide by our code of supplier conduct and address modern slavery concerns in their policies.
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups where applicable. Our staff are encouraged to bring any concerns they have to the attention of management.

We have a dedicated compliance team, which consists of representatives and involvement from the following departments:

- Audit and Compliance.
- Human Resources.
- Finance and Procurement.
- Sales.

## TRAINING

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 training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

All of our staff receive training and support that is appropriate to their role. Information is clearly outlined through induction, employment handbooks and policies. Training in particular includes:

- Our Leadership, Sales and Operations teams receive detailed training in identifying and resolving concerns around modern slavery and human trafficking
- Our Recruiters, HR personnel, and/or staff involved in our procurement and supply chains, undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues
- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

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## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Suppliers are required to complete our 'Finance New Supplier' questionnaire and demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet our standards and make improvements where required. This in conjunction with our training and compliance checks, allows us to continually monitor and 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(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2022.

This statement has been approved by the organisation's Board of Directors who review and update it annually.

**Craig Swinburn**  
**CCO**  
**28<sup>th</sup> June 2023**

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