

MODERN SLAVERY ACT 2015: Slavery and Human Trafficking Statement

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HR Department

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INTRODUCTION FROM THE BOARD

At Sword IT Solutions, we are committed to conducting our business with integrity, transparency, and respect for human rights. We recognise our responsibility to prevent modern slavery and human trafficking in all forms within our operations and supply chains.

We have implemented robust policies and controls to ensure that all employees, business partners, and suppliers are treated fairly and ethically. We do not tolerate any form of slavery, servitude, forced or compulsory labour, or human trafficking, and we take proactive steps to ensure that these practices are not present in any part of our business.

We are proud of the progress we have made and remain committed to continuously improving our practices to identify, prevent, and address any risks related to modern slavery. This statement outlines our understanding of these risks and the actions we have taken to mitigate them across our organisation and supply chain.

OUR BUSINESS

Sword IT Solutions specialises in designing, delivering, and supporting business technology solutions tailored to meet our customers' unique challenges. We manage projects and provide services across a wide range of industries, always guided by our clients' operational needs and transformation goals.

With over 30 years of successful service delivery, our teams operate from offices in Aberdeen, Glasgow, Teesside, London, Rijswijk (Netherlands), and Houston (USA). Our professionals bring together deep expertise in IT, data, and digital technologies, combined with strong domain knowledge. Sword IT Solutions is part of the wider Sword Group—an international software and services organisation with more than 3,000 employees across over 50 countries.

OUR SUPPLY CHAINS

As a provider of professional digital, technology, and IT services, Sword IT Solutions operates without a complex supply chain. We are committed to ethical business practices and have a zero-tolerance policy toward slavery and human trafficking. We do not engage with, support, or conduct business with any organisation involved in such practices. Our procurement activities are managed both centrally from our Head Office and locally across our UK markets.

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OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are dedicated to preventing modern slavery and human trafficking within our business and supply chains. To support this commitment, we have implemented a range of policies and principles, alongside our published Core Values, that guide our approach to identifying and mitigating risks related to modern slavery and human trafficking across 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.

Ethical Policy: Our Ethical Policy reinforces the responsibilities we hold toward one another, our clients, and the communities in which we operate. It underpins our commitment to fostering an inclusive, respectful, and transparent workplace culture. This policy plays a key role in supporting our efforts to prevent modern slavery and human trafficking by promoting ethical behaviour, accountability, and a safe environment where concerns can be raised and addressed without fear of retaliation.

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

UN Sustainable Development Goals: As a signatory to the United Nations Global Compact since 2011, Sword Group is committed to upholding the 10 principles relating to human rights and labour, the environment and corruption. Accordingly, as part of Sword Group, we use the Sustainable Development Goals to guide our CSR strategy in order to better respond to the challenges of today's world.

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

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conducting spot checks.

- Our terms and conditions for the procurement of services allow for termination on the event of non-compliance.

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.

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.
- Talent Acquisition
- 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 employees. We also require our business partners to provide training to their employees 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

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- Our Talent Acquisition Team, 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.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

As part of our Supplier Evaluation and Management Process, all suppliers are required to complete our 'New Supplier Form' questionnaire. Through this process, suppliers must demonstrate that they provide safe working conditions where applicable, treat workers with dignity and respect, and operate ethically and in compliance with all relevant labour laws.

We actively engage with our suppliers to ensure they meet our standards and support them in making improvements where necessary. Combined with our internal training programmes and compliance checks, this approach enables us to continuously monitor and assess the effectiveness of our efforts to prevent modern slavery and human trafficking within our business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Sword IT Solutions' slavery and human trafficking statement for the financial year ending 2024.

This statement has been approved by the Board of Directors and is reviewed and updated annually.

Signed on their behalf by:

Kevin Moreton
CEO
9th June 2025

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