

Modern Slavery Act 2015: Slavery and Human Trafficking Statement

UK Policy

HR Department

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Introduction from the Board

At Sword IT Solutions, we remain committed to conducting our business with integrity, transparency, and respect for human rights. We recognise our responsibility to identify and address the risks of modern slavery and human trafficking within our operations and supply chains.

We adopt a proportionate, risk-based approach appropriate to the nature of our business and are committed to continuous improvement in our policies, processes, and oversight. We do not tolerate any form of slavery, servitude, forced or compulsory labour, or human trafficking.

This statement sets out the steps we have taken during the financial year ending 2025 to prevent modern slavery within our organisation and supply chains.

Our Business

Sword IT Solutions specialises in designing, delivering and supporting business technology solutions tailored to meet our customers' needs.

With over 30 years of successful service delivery, our teams operate across the UK and internationally, including in Aberdeen, Glasgow, Teesside, London, the Netherlands and the United States. Sword IT Solutions is part of Sword Group, a global software and services organisation operating in over 50 countries.

Our Supply Chains

As a provider of professional digital, technology and IT services, Sword IT Solutions operates with a relatively low-complexity supply chain compared to higher-risk sectors.

Our supply chain primarily consists of professional services, contractors, technology providers, and business support services. While the overall risk profile is lower, we recognise that risks may still arise and remain vigilant in our approach.

We will not knowingly engage with organisations involved in modern slavery or human trafficking and expect our suppliers to uphold the same standards.

Risk Assessment

We recognise that the risk of modern slavery may arise within supply chains, particularly where there is:

- Use of third-party labour or contractors
- Outsourced or international service provision
- Limited transparency over subcontracting arrangements

While our core activities are service-based, we apply a risk-based approach to identify, assess and manage potential exposure to modern slavery within both our operations and supply chain.

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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 any part of our business. Our approach is supported by a number of internal policies and frameworks:

Whistleblowing policy: We encourage employees, contractors, customers, and partners to report any concerns. Our procedures are designed to ensure disclosures can be made confidentially and without fear of retaliation

Anti-Bribery Policy: We are committed to acting ethically and with integrity in all business relationships and maintaining effective systems and controls to prevent wrongdoing.

Ethical Policy: Our Ethical Policy reinforces our commitment to responsible business conduct, promoting a culture of accountability, transparency and respect.

Supplier/Procurement Conduct: We require suppliers to operate in a lawful and ethical manner and to address modern slavery risks within their own operations.

Corporate Responsibility and Global Commitments: As part of Sword Group, we align with the UN Global Compact principles and Sustainable Development Goals, supporting responsible business practices globally.

Due Diligence Processes for Slavery And Human Trafficking

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

- Assess suppliers prior to engagement, including their approach to human rights and modern slavery
- Conduct appropriate checks before entering into commercial relationships
- Maintain a preferred supplier framework based on due diligence outcomes
- Include contractual provisions allowing termination in the event of non-compliance
- Carry out periodic reviews and, where necessary, additional checks or audits

We have in place systems to:

- Identify and assess potential areas of risk
- Mitigate and monitor risks across our supply chains
- Support and protect individuals who raise concerns

Supplier Adherence and Governance

We expect all suppliers and partners to adhere to our ethical standards and values. We seek to ensure this through:

- Supplier compliance expectations and contractual obligations
- Ongoing engagement with suppliers to improve transparency and standards
- The ability to conduct reviews or checks where concerns arise
- Governance oversight from a cross-functional compliance group, including HR, Procurement, Finance and Audit

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Training and Awareness

We provide training and awareness programmes to ensure our employees understand the risks of modern slavery and how to respond to concerns.

Our approach includes:

- Role-specific training for employees in higher-risk areas such as procurement, HR and leadership
- Awareness training for all employees through induction and policy communications
- Encouragement for employees to speak up where concerns arise

Our Effectiveness in Combating Slavery and Human Trafficking

We assess the effectiveness of our approach through a combination of governance, monitoring, and internal controls. This includes:

- Supplier onboarding checks and ongoing monitoring
- Completion of training programmes across key roles
- Review of any concerns raised through whistleblowing processes
- Monitoring supplier compliance and addressing any issues identified

Where relevant, we continue to enhance our data collection and reporting to support improved transparency and oversight.

Continuous Improvement

Over the next reporting period, we will:

- Further develop supplier risk segmentation and due diligence processes
- Strengthen the use of data and metrics to assess effectiveness
- Continue to raise awareness across our workforce
- Review and evolve our policies in line with emerging best practice and regulatory expectations

Approval

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 2025.

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

Signed on their behalf by:

Kevin Moreton
CEO
22nd June 2026