

Modern Slavery Policy

STATEMENT OF GENERAL INTENT

Introduction

Strategy IT Limited is committed to acting ethically and with integrity in all our business dealings and supply chains. We comply with the Modern Slavery Act 2015. Modern slavery is a crime and a violation of human rights. We have a zero-tolerance approach to modern slavery, and we expect the same from our suppliers and partners.

Although not legally required under Modern Slavery Act 2015 (Section 54) (due to turnover below £36m), we voluntarily adopt this policy to demonstrate ethical responsibility and transparency. We are not required to submit to the UK Government registry, but we voluntarily publish our statement on our website.

Purpose

- Prevent modern slavery in our operations and supply chains.
- Provide procedures for identifying, reporting and addressing risks.
- Provide clear responsibilities and demonstrate accountability.
- Promote transparency, integrity and wellbeing.
- Ensure compliance with UK law and ethical business practice.

Scope

- All employees, temporary staff and contractors.
- All suppliers, partners and subcontractors engaged with Strategy IT Limited.

Legal & Regulatory Alignment

Legislation / Regulation	Key Focus
Modern Slavery Act 2015	Prevention of modern slavery, ethical procurement and supplier due diligence to prevent exploitation.
Human Rights Act 1998	Fundamental rights and freedoms. Prohibition of slavery and forced labour (Article 4).

RESPONSIBILITIES

Role	Key Responsibility
Employees	Comply with this policy and complete training. Promptly report suspected or actual breaches. Cooperate with audits, compliance checks and investigations.
Suppliers / Contractors	Uphold a zero-tolerance approach to modern slavery and comply with UK law. Promptly report breaches. Cooperate with audits, compliance checks and investigations.
Directors	Lead by example, ensure staff awareness, act promptly and appropriately on breaches. Maintain accountability and oversight.
Company	Provide training, guidance, resources, secure systems, fair and transparent monitoring. Publish the annual modern slavery statement on the website.

ARRANGEMENTS

1. Definition

As defined in the Modern Slavery Act 2015, modern slavery includes:

- Slavery
- Servitude
- Forced or compulsory labour
- Human trafficking

All of which have in common, the deprivation of an individual's liberty by another, with the intent to exploit them for personal or commercial gain.

2. Our Commitment

- We will not tolerate modern slavery in any part of our operations or supply chain.
- We expect the same commitment from our suppliers and partners.
- Persistent non-compliance will result in contract termination and, where appropriate, reporting to authorities.

3. Supply Chain Standards

- Conduct risk-based due diligence on suppliers, prioritising higher-risk sectors (e.g. IT hardware, overseas subcontracting, recruitment agencies).
- Include anti-slavery clauses in all supplier contracts.
- Require suppliers to confirm compliance with relevant legislation.

4. Risk Assessment & Management

- Assess risks in procurement, recruitment and supplier engagement.
- Prioritise ethical sourcing, transparency and continuous monitoring.

5. Training & Awareness

- Induction training provided to all new staff.
- Annual refresher training provided.
- Policies and guidance (e.g. plain-language summaries, infographics) are issued to all employees during induction, available on the company intranet and notice boards, reviewed annually and updated as required.

6. Whistleblowing & Reporting Concerns

- Concerns can be reported to any member of the Board.
- Anonymous reporting permitted.
- Reports investigated fairly, promptly and confidentially.
- Retaliation against whistleblowers will not be tolerated, in line with the Public Interest Disclosure Act 1998 and the whistleblowing protections within the Employment Rights Act (as amended by the Employment Rights Act 2025, including sexual-harassment-related disclosures).

7. Disciplinary Consequences

- Breaches may result in disciplinary action, up to and including dismissal, in line with the Disciplinary, Dismissal & Grievance Policy.
- Serious breaches may be reported to regulators or law enforcement.

8. Review

- This policy will be reviewed annually (or sooner if legislation changes) to ensure effectiveness, compliance with UK law and alignment with best practice.
- Updates will be communicated to all staff.

Approved by: Board of Directors, Strategy IT Limited

Date: 31/03/2026