

# Strategy IT

## Modern Slavery Policy

Company	Human Resources Officer	Regulations
Strategy IT Limited	Paula Musekiwa	Modern Slavery Act 2015

### STATEMENT OF GENERAL INTENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are committed to comply with the Modern Slavery Act 2015.

Subject to Review	Signed	Date
Annually	<i>Paula Musekiwa</i>	31 March 2025

### RESPONSIBILITIES

#### Company and Directors Key Responsibilities

- Ensure standards in the policy are established and communicated to staff.
- Ensure the policy is readily available to staff.
- Ensure the policy is readily available to contractors, suppliers and other business partners.
- Ensure the policy is published on the website.
- Provide clarification, where required, to improve staff understanding.
- Assess and monitor compliance with the policy.
- Take appropriate action at the earliest opportunity to manage non-compliance with the standards set out in the policy.
- Actively promote the Company's commitment to the Modern Slavery policy.
- Set a positive personal example to staff.

#### Human Resources Officer Key Responsibilities

- Monitor the implementation of the policy throughout the Company and review its appropriateness annually.
- Investigate complaints or breaches and implement corrective action.
- Review legislation and implement any new requirements pertaining to the Company.
- Liaise with directors and staff as and when appropriate.
- Liaise with contractors, suppliers and other business partners as and when appropriate.

#### Employees Key Responsibilities

- Familiarise themselves with the policy and fully comply with it.
- Ask for clarification on any aspects of the policy that they are unsure about.
- Report, as soon as possible, any known or suspected breach of the policy to the Human Resources Officer or a Director.

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ARRANGEMENTS	
Forms of Modern Slavery	<p>The following are forms of modern slavery, that the policy aims to avoid:</p> <ul style="list-style-type: none"> <li>• Slavery</li> <li>• Servitude</li> <li>• Forced and compulsory labour</li> <li>• Human trafficking</li> </ul> <p>All of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.</p>
Commitments	<p>We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:</p> <ul style="list-style-type: none"> <li>• A zero-tolerance approach to modern slavery in our organisation and our supply chains.</li> <li>• The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain.</li> <li>• Staff must not engage in or facilitate any activity that might breach or lead to a breach of the policy.</li> <li>• We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.</li> <li>• We take a risk-based approach to our contracting processes and keep them under review.</li> <li>• 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.</li> <li>• The same high standards are expected from all our contractors, suppliers and other business partners.</li> </ul>
Communication and Awareness	<ul style="list-style-type: none"> <li>• Our zero-tolerance approach to modern slavery must be communicated to all staff, suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.</li> </ul>
Complaints and Breaches	<ul style="list-style-type: none"> <li>• All staff are encouraged to raise any concerns or suspicions of modern slavery in any parts of our business or supply chains at the earliest possible stage.</li> <li>• If staff believe or suspect a breach of the policy has occurred or that it may occur, they must notify the Human Resources Officer or a Director as soon as possible.</li> <li>• We aim to encourage openness and will support anyone who raises genuine concerns in good faith under the policy, even if they turn out to be mistaken.</li> <li>• We are committed to ensuring no one suffers any detrimental treatment as a result of reporting genuine concerns in good faith under the policy. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.</li> <li>• All complaints of will be fully investigated by the Company.</li> <li>• We will take appropriate action to prevent, as far as possible, a further occurrence.</li> </ul>
Disciplinary Actions	<ul style="list-style-type: none"> <li>• We have a zero-tolerance approach to modern slavery.</li> <li>• Any staff who breach the policy will be subject to disciplinary action.</li> <li>• Disciplinary actions will vary depending on the violation.</li> <li>• If we find that an individual or organisation working on our behalf has breached the policy we will take appropriate action.</li> <li>• Possible consequences include: <ul style="list-style-type: none"> <li>○ Remediation and reprimand</li> <li>○ Remediation and demotion</li> <li>○ Suspension or termination of employment</li> <li>○ Suspension or termination of business relationship</li> <li>○ Legal action</li> </ul> </li> </ul>

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Review	<ul style="list-style-type: none"><li>• The policy will be reviewed annually.</li><li>• The policy will be reviewed in response to changes in legislation and industry best practice.</li></ul>
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CONTACTS		
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