

SWARCO

Anti Modern Slavery & Human Trafficking Policy

SGUKI-QHSSE-POL-009



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MODERN SLAVERY POLICY

This policy applies to the SWARCO Group of companies based in the UK & Ireland; SWARCO UK & Ireland Ltd, SWARCO UK Ltd, SWARCO Smart Charging Ltd and APT Skidata Ltd, collectively referred to hereafter as "The Company".

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the Company has taken and is continuing to take to ensure that Modern Slavery or Human Trafficking is not taking place within our business or supply chain.

1 Policy Statement

The Company have a zero-tolerance policy towards Modern Slavery and are committed to ensuring that there is no Modern Slavery or Human Trafficking in our supply chains or in any part of our business.

Modern Slavery is a violation of human rights and takes various forms such as slavery, forced and compulsory labour, child labour, exploitation and having restrictions on freedom of movement ensuring personal or commercial gain.

The Company expect all parts of the business, along with contractors and suppliers, to act in an ethical manner and to consistently work within the standards set under the Modern Slavery Act 2015. We include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect our suppliers and contractors to hold their own suppliers to the same standards.

This policy applies to all persons working for the Company in any capacity, including but not limited to directors, employees, agency works, interns, contractors, third party representatives, suppliers and business partners. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Anti-Modern Slavery Policy.** This Policy sets out the organisation's stance on Modern Slavery and where to report any concerns. Our online specialist training conducted via Human Focus covers how to identify instances of modern slavery.
- **Recruitment Policy.** We undertake pre-employment screening that includes identity checks and confirmation of entitlement to work in the UK, on all employees prior to commencing employment with us. On joining, each employee attends a comprehensive induction which covers the essential information in relation to policies and procedures and matters such as whistleblowing.
- **Whistleblowing Policy.** We operate a Whistleblowing Policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- **Code of Conduct.** This Code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- **Grievance Policy.** The Company have an effective Grievance process in place to cover any concerns within the business.

2 Compliance with the Policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for The Company or companies with whom we do business with (including subcontractors, consultants, agency staff etc.).

All employees are required to avoid and to report on any activity that might lead to or suggest a breach of this policy.

We encourage openness and we will support anyone who raises genuine concerns in good faith in line with this policy. This is applied through by line management; the Managing Director or the HR Director; or alternatively, in accordance with our corporate whistleblowing policy.

Failure to comply with this statement or related policy will be taken seriously and, may lead to initiation of the disciplinary process or through a review of supply chain business relationship with third parties.

2.1 Our Supply Chains

All procurement of services and supply is undertaken by specific people within our business units. The Company aim to build long term sustainable relationships with strategic suppliers, encouraging collaborative working and exchange of innovative and good industry practices.

The Company procure from well-established and recognised Companies in the UK, Austria, Spain, Germany and Denmark.

2.2 Due Diligence Processes

The Company have carried out a risk-based analysis with regards to Slavery and Human Trafficking on our own operations and within our supply chain, having special regard for the locations of those operations and types of service.

The Company have put in place a system to:

- Evaluate new suppliers as part of the tendering process
- Identify and assess potential risk areas in our supply chains.
- Monitor potential risk areas in our supply chains on a regular basis.

The Company shall conduct periodic audits of our supply chain to assess their compliance to the Act, raise awareness and ensure they have Anti Modern Slavery and Human Trafficking statements / policies in place themselves.

3 Communication and Awareness

Our zero-tolerance approach to modern slavery will form part of the induction process, be visible on company websites and noticeboards and is included in the Procurement Code of Conduct with our supply chain. The recruitment process for all levels, includes confirmation of rights to work in the countries where we operate.

4 Reporting Concerns

The Company encourages employees to raise concerns about any issue or suspicion of modern slavery in any parts of our business, or supply chains of any supplier tier, at the earliest possible stage.

Where an employee believes or suspects a breach of this policy has occurred or that it may occur, they must inform the Head of Human Resources or report it in accordance with the Whistleblowing Policy as soon as possible.

If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they must raise it with the Head of Human Resources.

5 Key Performance Indicators

Our measures to combat Modern Slavery are in constant review, and the pro-active regime of training and internal and external audits shall continue and will be stepped up to maintain compliance.

Our main KPI is the number of incidents raised. During 2025 no incidents on Modern Slavery were raised throughout any of the channels provided.

This policy will be reviewed annually to assess its implementation and effectiveness. This is in line with statutory requirements.

6 Review & Approval

Signed:		Date:	23/01/2026		
Subject to review, monitoring and revision by:	John Pickworth, Managing Director	Every:	12	Months or sooner if work activity changes	

7 Definitions

Term	Description

8 References

REF	Document Reference	Title

9 Revision History

Rev	Issue Date	Reason for Issue
1.0	03/02/2023	New Document First Issue
2.0	15/01/2024	Annual Review – Updated to include specific arrangements
3.0	23/01/2025	Reviewed and updated onto new template, inclusion of SWARCO Ireland Ltd
4.0	23/01/2026	Reviewed and removed SWARCO Ireland Ltd