

POL14 Modern Slavery Policy

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1. Introduction

This policy sets out Smart Training and Recruitment Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. It is made in accordance with Section 54(1) of the Modern Slavery Act 2015

To be clear, we are committed to playing our part in eradicating modern slavery and as a responsible business, we aim to operate ethically and responsibly at all times. We maintain a zero-tolerance approach to modern slavery of any kind within our business or supply chain.

Our organisation is a training provider based in England. We offer apprenticeships, functional skills training, traineeships and recruitment services. We deliver these across multiple subject sector areas. Smart Training and Recruitment Limited does not operate outside of England.

2. Compliance within our organisation

We are comfortable from our on-going internal due diligence that there is no evidence of modern slavery or human trafficking within our organisation. However, should our due diligence find a supply chain partner to be in breach of our standards, we would immediately consider invoking sanctions including the termination of the business relationship. We expect to see the same stance on Modern Slavery as we take, within each supplier and business partner's own policies and procedures, these are reviewed upon Smart Training and Recruitment Limited initially doing business with each supplier and business partner as per standard due diligence.

Smart Training and Recruitment Limited are committed to being a responsible business and ensuring our employees work in environments which are safe and do not impact on their human rights. We seek to comply with all employment legislation. As part of this, we conduct a robust pre-employment process to ensure all employees have the appropriate right to work in the UK. This process is in line with the Safer Recruitment Policy.

All of our policies and procedures in relation to Modern Slavery and Human Trafficking are available to all employees through our internal SmartNet system. All new starters are required to read through our policies as part of their induction process.

3. Supply chain and business partners

Our supply chain partners must comply with all relevant and applicable laws and regulations. This includes those relating to Modern Slavery, Human Rights and Employment Law. and we expect all suppliers and business partners to comply with it. This includes:

- *Opposing the abhorrent exploitation of child labour*
- *Acting honestly, ethically and with integrity at all times*
- *Not knowingly making purchases or entering into agreements with organisations which do not comply fully with the labour, safety and other relevant laws of their respective country as per the Modern Slavery Act 2015*

4. Monitoring

We are committed to reviewing this policy annually.

5. Contacts

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