

## Modern Slavery Act Statement

### What this statement/policy covers

Slavery and Human Trafficking stays a concealed blight on our global society. We all have an obligation to be aware of the dangers, however little, in our business and in the more extensive supply chain network.

### Our Commitment

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. SMART Tool Group Global Ltd has a zero-tolerance policy to any form of modern slavery. We are committed to acting ethically and with integrity in the entirety of our business relationships and to putting effective processes and controls in place to protect against any form of modern slavery in our supply chain and in our business.

### Due diligence processes in our business

SMART Tool Group Global Ltd operates throughout the UK and Europe and our products are sourced from Europe and offshore suppliers and we expect all those in our supply chain to comply with our values. We are committed to ensuring this.

As part of our initiative to identify and mitigate risk the Company has in place systems and policies such as recruitment policies and whistleblowing policies. This encourages the reporting of concerns and protects whistleblowers. We value our staff and do all we can to ensure that we are conducting our business in an ethical and transparent manner.

### Our Suppliers

SMART Tool Group Global Ltd uses the following key performance indicators to measure how effective we have been to ensure that modern slavery is not taking place in any part of our business or supply chain.

- 1) Monitoring our suppliers to ensure they have taken steps to eradicate modern slavery
- 2) A level of communication is maintained and personal contact with the supply chain to ensure their understanding of, and compliance with our expectations.
- 3) We conduct a search or on-site audit of our suppliers to ensure that particular organisation has never been convicted of offenses relating to modern slavery.
- 4) We regularly review supply chain policies, codes of conduct and our working practises to show commitment, we may terminate a supplier contract should any instances of modern slavery come to light.

### Training

The management team are responsible for compliance within their respective departments and in their supplier relationships and have all been trained accordingly. All employees receive an induction where our policies, procedures and expectations are outlined.

This statement is made in accordance with section 54(1) of the modern slavery act 2015 and sets out the steps that SMART Tool Group Global Ltd have taken and is continuing to take to safeguard against modern slavery and human trafficking within our business or supply chain.

This policy was approved by the Board of Directors and signed for and on behalf of SMART Tool Group Global Ltd by



**Bruce Webberley** (General Manager)

Date: 25.01.23