

Modern Slavery Policy Statement

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 to exploit them for personal or commercial gain.

SarStuff CIC has 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 implementing and enforcing 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 also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibility for the policy

SarStuff CIC has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

SarStuff CIC has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Mick Desmond mick@sarstuff.co.uk.

SarStuff CIC, Maple Barn, Canterbury, KENT CT4 8HF



01233 800 165



info@sarstuff.co.uk



www.sarstuff.co.uk

Helping you help others – SarStuff CIC is a not for profit dedicated to creating bespoke software systems for the emergency services and their partners.

Company Number: **10380784**

VAT Number: **320109755**

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Our Suppliers

Supplier	Modern Slavery Statement Link
Amazon Web Services	https://sustainability.aboutamazon.com/modern-slavery-statement.pdf
Azure Cloud Services	https://aka.ms/modernslaveryandhumantrafficking
Gov.uk	
Ordnance Survey	https://www.ordnancesurvey.co.uk/governance/policies/anti-slavery
Mapbox	https://www.mapbox.com/legal/responsible-procurement-policy
Cisco	https://www.cisco.com/c/dam/en_us/about/supply-chain/cisco-modern-slavery-statement.pdf
Twilio	https://www.twilio.com/en-us/legal/supplier-code-of-conduct
MongoDB	https://www.mongodb.com/legal/modern-slavery-statement
Cloudflare	https://www.cloudflare.com/modern-slavery-act-statement/

We understand that our supply chains present a need for focused efforts to assess the risk of modern slavery. We prioritise the protection of human rights within our supply chain.

We routinely evaluate our supply chains to understand the highest risks to workers and prioritise our efforts to address both site-specific challenges and broader, systemic risks.

We require suppliers to continuously monitor and their own operations and supply chain policies as linked above, including with subcontractors. Suppliers are encouraged to self-evaluate and make improvements to meet or exceed our expectations and those of our customers as reflected in our standards.

We encourage suppliers to continuously assess their risks specific to groups that may be more vulnerable to exploitation, including women, children, indigenous peoples, and temporary or migrant workers.

As can be seen above our suppliers and or their parent company have published robust statements relating to modern slavery and their supply chains.

Compliance with the policy

You must ensure that you read, understand and comply with this 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 us or under our control.

You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify Mick Desmond as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged 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.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify Mick Desmond.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

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If you are 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, raise it with Mick Desmond.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform Mick Desmond immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.

This Modern (Anti) Slavery Policy and Statement is intended for businesses in all countries, especially the United Kingdom.

SarStuff CIC modern slavery KPI's for the coming year 2025

KPI	Target Period	Achieved
Staff training program relating to modern slavery awareness	Q3 2025	
Improving the internal processes for reporting incidents of modern slavery	Q3 2025	
Supply chain risk factors assessed	Q4 2025	

Communication & awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Approval For This Statement

This statement was approved by the Board of Directors of SarStuff CIC.

Mick Desmond
Director
28/11/2024

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