

**Modern Slavery Statement**  
**For Financial Year 2021 - 2022**

**Version History & Approval**

<b>Version</b>	<b>Financial Year</b>	<b>Approval on behalf of board of directors</b>	<b>Date of Approval</b>	<b>Director's Signature</b>
1.0	2021-2022	Tom Steer Commercial Director	07/11/2022	

**Purpose And Scope of Statement**

Softwire is committed to upholding human rights and dignity in the way it operates.

This statement sets out the steps Softwire has taken in the year ending 31<sup>st</sup> December 2022 (FY 2022) to prevent modern slavery and human trafficking in our business and supply chain. This statement has been approved by Softwire's board of directors (see version history above).

**Organisation and Business Structure**

Softwire is a privately owned software development company headquartered in London, with satellite offices in Manchester and Cambridge and a wholly owned subsidiary in Romania. We are specialists in the delivery of software consultancy and bespoke, custom-built software solutions.

Our services are primarily delivered by employees of Softwire and its Romanian subsidiary. We additionally make use of independent contractors, and developers supplied by third party organisations.

**Supply Chain**

Softwire's supply chain includes:

- contractor and sub-contractor resources delivering services to Softwire's clients on behalf of Softwire;
- business services such as external training and real estate services;
- advisors such as business auditors, legal counsel and insurance brokers;
- products and services to support our staff and maintain our offices such as food and beverages, cleaning, and waste recycling;
- equipment and services to support our IT infrastructure such as laptops, printers and cloud service.
- recruitment agencies to recruit permanent staff and contractors.

**Policies, Procedures and Schemes**

We have a number of policies, procedures and schemes in place that help to reduce the risk of slavery or human trafficking occurring within Softwire's operations and supply chains:

- **Employee Assistance Scheme**

Our employee assistance scheme is provided by an independent third-party company that can be used by employees for free and confidential advice in relation to workplace concerns or issues.

- **Acceptable Behaviour in the Workplace**

A policy stating our commitment to ensure that Softwire is a pleasant and positive place in which to work and detailing what to do when unacceptable behaviour occurs.

- **Health and Safety**

A policy stating Softwire's commitment and approach to ensuring it provides a healthy working environment.

- **Whistleblowing**

A policy supporting employees, contractors, service providers or any other person associated with Softwire in reporting professional malpractice.

- **Grievance**

A procedure for raising and dealing with grievances in an atmosphere of trust and collaboration.

- **Equal Opportunities**

A statement of Softwire's commitment to uphold equality and diversity in the workplace and to tackle all form of unlawful or unfair discrimination, harassment and victimisation.

- **Supplier Code of Conduct**

Our Supplier Code of Conduct sets out the standards we expect our suppliers to observe including a commitment to ensure that slavery and human trafficking do not exist within the supplier's business or its own supply chain.

Softwire is proud of the schemes it has in place to promote corporate social responsibility, including:

- **Pro Bono Scheme**

Softwire performs its services for free to support a variety of charities and not-for-profit organisations in their valuable work. In FY 2021, at least £32,000 of pro-bono work was delivered.

- **Charitable Donations**

Between 2018-2021, Softwire matched over £83,000 of charitable donations by our staff.

- **Charity Saturday**

This is a scheme whereby employees volunteer to deliver work for clients at the weekend (or by taking a day of holiday) and Softwire donates all revenue received to charity.

- **Charity Holidays**

We offer our employees the chance to participate in charity holidays whereby employees can take paid leave in addition to their basic allocation to volunteer for a charity. In 2021 alone, 64 days of charity holidays were taken by staff to help support a cause of their choice.

- In 2021 we raised circa £79,000 for charity through donation matching, charity Saturdays and charity holidays outlined above.

- **Ethical Food Choices**

When sourcing food and beverages for our offices Softwire seeks opportunities to make ethical choices, including short supply chains, to minimise exposure to modern slavery risks. For example, Softwire has partnered with a company that sources fruit from the UK and Europe and plants trees in Africa to support sustainable produce and local communities. In addition, we purchase meat produce from nearby retailers so that the local community directly benefits from our presence.

### **Human Rights in the Workplace**

Softwire supports human rights in the workplace and, as stated in our Supplier Code of Conduct, we expect our suppliers to do the same by:

- safeguarding against any engagement in forced labour, human trafficking and child labour;
- not withholding worker identity documents, work permits or immigration documents;
- not charging recruitment fees to workers or potential workers.
- ensuring that workers can cancel their work contracts at any time with no financial penalty, by giving reasonable notice;
- providing workers with wages, benefits and working hours that meet or exceed applicable legal requirements;
- giving workers detailed and accurate employment contracts (prior to relocation if relocation is required);
- checking workers' documents before they begin work to confirm they are allowed to work in accordance with applicable laws;
- upholding workers' rights if they wish and in line with applicable laws to join organisations such as trade unions and worker councils and to bargain collectively without fear of discrimination or harassment.

### **Risk Assessment and Due Diligence**

Softwire has assessed the level of risk associated with each sector in our supply chain and has determined the actions we will take to address the risks identified. Our sector-level assessment is set out in Appendix 1. After completing this high-level assessment, Softwire built a register of service providers that have delivered services to Softwire in FY 2022. For each service provider we recorded an individual risk assessment, the actions taken to manage the risk and any evidence we found of modern slavery or human trafficking. A process has been set up to maintain and update the register on an on-going basis.

## Training

This statement and our policies are published in Softwire's Employee Handbook. On an annual basis, employees are asked to confirm that they have read and understood Softwire's policies and statements on business ethics including this statement.

## Self-Assessment

The table below records our assessment of the progress we have made in FY 2022 in implementing and following procedures to prevent modern slavery and human trafficking in our supply chain.

Action	Progress
Perform supplier sector-level risk assessment	Completed
Perform individual service provider risk assessments (FY 2022)	Completed
Include modern slavery clause and Supplier Code of Conduct in Softwire standard contracts	Completed
Send emails to office service providers and recruitment agencies (highest risk supplier sectors) requiring compliance with Supplier Code of Conduct and Modern Slavery Act	Completed
A process has been established for on-going assessment of Softwire's business and supply chain	Completed
Board of Softwire has been regularly informed of progress	Completed
Softwire employees have been informed of Modern Slavery Statement	Completed
Modern Slavery Statement has been linked to Softwire website home page	Completed

## Appendix 1

### Sector-Level Assessment of Suppliers

Service Provider	Level of Risk	Actions
<b>Contractors, Subcontractors and Business Service Providers</b>	<p>Low risk</p> <ul style="list-style-type: none"> <li>• due to the highly skilled nature of the services</li> </ul>	<p>Despite the finding of low risk, given that this is our largest supplier sector, we are introducing a number of actions as follows:</p> <ul style="list-style-type: none"> <li>• Update Software's standard contract to include modern slavery clause and Supplier Code of Conduct</li> <li>• Negotiate inclusion of modern slavery clause and Supplier Code of Conduct in new non-standard contracts</li> </ul>
<b>Professional Advisors</b>	<p>Very Low risk</p> <ul style="list-style-type: none"> <li>• due to the highly skilled nature of the services and professional status.</li> </ul>	<ul style="list-style-type: none"> <li>• Review advisors' websites and terms of business to check for commitments to prevent modern slavery and human trafficking</li> <li>• Request further information directly from advisors if commitment is not clear</li> </ul>
<b>IT &amp; Office Infrastructure Providers</b>	<p>Low Risk</p> <ul style="list-style-type: none"> <li>• Suppliers of IT infrastructure are generally large organisations required to publish an anti-slavery statement</li> </ul>	<ul style="list-style-type: none"> <li>• Review suppliers' websites and terms of business to check for commitments to prevent modern slavery and human trafficking</li> <li>• Request further information directly from suppliers if commitment is not clear</li> </ul>
<b>Office Service Providers (e.g., cleaners and paper recyclers)</b>	<p>Moderate Risk</p> <ul style="list-style-type: none"> <li>• due to the nature of the work, high staff turnover and prevalence of agency workers within the sectors</li> </ul>	<ul style="list-style-type: none"> <li>• Email service providers stating requirement to comply with the Modern Slavery Act 2015 and Supplier Code of Conduct</li> <li>• Negotiate to include anti-modern slavery clause and Supplier Code of Conduct in new non-standard contracts</li> </ul>
<b>Providers of Consumables</b>	<p>Low Risk</p> <ul style="list-style-type: none"> <li>• Providers of consumables are generally large organisations</li> </ul>	<ul style="list-style-type: none"> <li>• Review suppliers' websites and terms of business to check for commitments to prevent modern slavery and human trafficking</li> <li>• Request further information directly from suppliers if commitment is not clear</li> </ul>

	required to publish an anti-slavery statement	
<b>Recruitment Agencies</b>	<p>Moderate/High Risk</p> <ul style="list-style-type: none"> <li>Recruiters may use third parties or engage staff in jurisdictions with a higher risk for modern slavery</li> </ul>	<ul style="list-style-type: none"> <li>Update Softwire's standard contracts to include modern slavery clause and Supplier Code of Conduct</li> <li>Negotiate to include modern slavery clause and Supplier Code of Conduct in new non-standard contracts</li> <li>Send questionnaire to recruiters regarding compliance with Modern Slavery Act 2015 requesting a commitment to comply with Supplier Code of Conduct <ul style="list-style-type: none"> <li>Based on feedback, request further action if necessary</li> </ul> </li> </ul>