



## Modern Slavery Statement

### Overview

At Smartbox, we are committed to eliminating acts of modern-day slavery and human trafficking within our business and from within our supply chains. We have a zero-tolerance approach to any form of modern slavery.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015. This statement sets out the steps that Smartbox Assistive Technology has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or within our supply chain.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and applies to all companies within and associated with Smartbox Assistive Technology including all subsidiaries operated within our group structure. It is reviewed each financial year.

The Group CEO and other Company Directors maintain the overall accountability for adherence to this statement.

### Our Structure

The Smartbox Group has a global annual turnover greater than the threshold of £36 million per annum.

Across all group companies we have more than 500 employees worldwide and operate within offices in 4 countries, Ireland, Germany, USA and UK.

Our network of Global Partners operate in more than 40 countries.

Smartbox is part of the CareTech group of companies.

### Our Commitment

We are committed to acting ethically, with integrity and transparency in all business and employment dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

We understand and adhere to all business standards outlined by law in all locations of business operations and employment.

### Our Policies

We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent, and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our company culture and core values.

Our core values; passionate, caring, empowering, achieving together, and enabling change are embedded throughout our business and set the parameter for how we expect people to behave with their colleagues, our users, our suppliers, and the world at large.

We comply with our legal obligations to ensure the health and safety and fair treatment of all our team members, including in relation to pay, working hours, rest breaks, annual leave, and performance.

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

1. Safeguarding policy - This policy is a framework that will direct and support the way we all work as Smartboxers, enabling us to Recognise, Respond, Report, Record and Refer a concern appropriately, regardless of the role and level of contact we have with our end users.
2. Recruitment policy - We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all team members to safeguard against human trafficking or individuals being forced to work against their will, as well as criminal record checks if applicable to their role - these are conducted prior to their first day.
3. Speak Up policy - At Smartbox we are committed to maintaining the highest standards of integrity, ethics, and compliance in all aspects of our business. We value transparency and encourage our team members, contractors, and stakeholders to report any concerns or suspected wrongdoing without fear of retaliation.
4. Antibribery and Corruption policy - This policy outlines the Company's position on preventing and prohibiting bribery, under the Bribery Act 2010. Smartbox Assistive Technology will not tolerate any form of bribery by or of its team members, agents or consultants, or any person or body acting on our behalf.

## **Our Suppliers**

We maintain a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This involves operating with integrity, echoing our values, and following our Supplier Approval process found in our Quality Management System.

Smartbox Assistive Technology requires our strategic suppliers to follow and agree to the Fair Labour Association (FLA) principles and ensure ongoing monitoring within their businesses, which may be audited by a member of the Smartbox Assistive Technology audit team.

## **Assessing and Managing Risk**

We consider ourselves to be a 'low risk' business regarding slavery and human trafficking. However, we foster a culture that encourages the identification and reporting of any such risks within our business.

We seek to identify, assess and monitor areas in our business and supply chains where there may be a risk of modern slavery and human trafficking taking place. We also take steps to mitigate and manage identified risks.

Our primary risk for exposure to modern slavery and human trafficking risks is from our suppliers. We utilise our supplier approval process to ensure due diligence to mitigate these risks by evaluating our suppliers, communicating and reinforcing our expectations, confirming their compliance with applicable laws and establishing a platform for corrective action or improvements where required.

## **Our practices**

1. Smartbox Assistive Technology has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.
2. In accordance with section 54(4) of the UK Modern Slavery Act 2015, Smartbox Assistive Technology has contacted (or will contact) all first tier suppliers to set out our zero-tolerance stance on modern slavery and to ensure that slavery and/or human trafficking is not taking place.
3. Smartbox Assistive Technology will take reports of modern slavery very seriously and cross reference such reports with our first-tier supply chain. Smartbox Assistive Technology will seek to discontinue business with any first-tier supplier found by the enforcement authorities to be involved in modern slavery or ensure that immediate corrective actions are taken by the supplier.
4. Smartbox Assistive Technology encourages use of its Speak Up policy to report any concerns regarding modern slavery and will investigate any complaints thoroughly.

## Our training and awareness

We believe in the importance of educating our team members on human rights issues and have launched bespoke training for relevant team members to help them to recognise the risks of modern slavery and human trafficking in our business and supply chain. Through this training, our team members are guided to use our procedures for reporting a business malpractice and to raise any concerns they might have with the Board.

We recognise the importance of our leadership teams to help in tackling modern slavery and so commit to training our leaders responsible for decision-making and with areas of the greatest potential risk to receive training.

## Our approach

We encourage our team members to report any concern, issue, or suspicion of modern slavery within any part of our business or supply chains immediately to our Designated Safeguarding Leads- [safeguarding@thinksmartbox.com](mailto:safeguarding@thinksmartbox.com).

All concerns will be investigated and if required reported to our group board within a reasonable time, typically within 14 days, on actions which may require to be taken using the [National Referral Mechanism](#).

Our team members will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. Our team members carry out a company induction whereby they are informed of the Modern Slavery Helpline and complete an internal training course on Human trafficking and Modern Slavery. (Guidance issued under section 54(9) of the UK Modern Slavery Act 2015).

## Measuring Effectiveness

To date, we have not identified any current suspected incidences of modern slavery in our supply chains.

## Further steps

We constantly strive to improve our systems and processes to ensure that modern slavery is not present in our supply chain or within our business.

To enhance our approach to tackling modern slavery within our business and from our preferred suppliers, we will:

- Continuously review our policies and practices.
- Further develop our training interventions to raise greater awareness within our business.
- Continue to assess and monitor the risk.
- Continue to measure our effectiveness to mitigate the risk of Modern Slavery.

## Approval

This statement relates to the 2023/2024 financial year.

This statement was approved by the Board of Directors of Smartbox Assistive Technology Ltd on 10/07/24 by *Dougal Hawes* Dougal Hawes, Group CEO.