

Modern Slavery Statement

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Smart Solutions' anti-slavery and human trafficking statement.

1st November 2024 – 31st October 2025

A message from our CEO

At Smart Solutions (Recruitment) Limited, we remain unwavering in our commitment to ethical business practices and integrity in everything we do. Preventing modern slavery is a critical part of this commitment, and we continue to strengthen our approach to identifying and mitigating risks within our operations and supply chain.

We recognise that tackling modern slavery requires vigilance, collaboration and continuous improvement. We therefore continue to work with specialist organisations and industry groups, including Slave-Free Alliance (SFA), Hope for Justice (H4J), Stronger Together (S2G) and the Indirect Procurement Human Rights (IPHR) Forum. These partnerships provide valuable insight, challenge and support, helping us to develop our processes and strengthen our safeguards.



We hold ourselves, and those we do business with, to high ethical standards. We expect our partners, suppliers and representatives to have robust measures in place to prevent modern slavery within their own operations and supply chains. To support this, we continue to develop our internal due diligence, compliance and reporting frameworks.

This Modern Slavery Statement reflects our ongoing commitment to identifying risks, supporting victims, raising awareness and driving meaningful action across our business and industry. We will continue to challenge ourselves, evolve our approach and play our part in preventing modern slavery.

A handwritten signature in black ink that reads 'M Spaul'.

Matt Spaul
Chief Executive Officer
Smart Solutions (Recruitment) Limited

Organisational Structure

Smart Solutions (Recruitment) Limited (SSR) is a partnership-driven outsourced labour solution, providing innovative workforce solutions for industries across the UK.

To deliver the highest level of expertise for our clients, SSR operates through two divisions, each with sector specialists dedicated to delivering high standards of service:

- **Environmental Support Services** – delivers a fully outsourced labour solution to the waste and recycling sector.
- **Managed Solutions** – encompasses labour supply and on-site managed service provision across a broad range of specialisms.

Legislation

The Modern Slavery Act 2015 was introduced to tackle slavery in the UK.

Modern slavery is a criminal offence and can take many forms, including slavery, servitude, forced or compulsory labour and human trafficking. These offences all involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Our Employees

Smart recognises that both our industry and the sectors we support can be targeted by individuals and organised groups seeking to exploit vulnerable people for financial gain.

Our workforce consists of permanent and flexible employees who work alongside our clients and their respective workforces.

Smart works closely with its clients and business partners to promote consistency, collaboration and shared responsibility in preventing hidden labour exploitation and modern slavery.

Review of Prior 12 months

Governance

Delivery of modern slavery prevention practices at Smart is led by **Jade Oliver-Morris, Chief People Officer**, with support from **Karla Conlan, National Accounts & Social Impact Manager**. Overall responsibility sits with the Smart Solutions CEO, who receives regular progress reports, alongside the Senior Management Team and Group Board.

Over the last 12 months, Smart has continued to review and strengthen its approach to the prevention of modern slavery across its operations and supply chain. This has included maintaining focus on right to work compliance, workforce transparency, supplier assurance and internal awareness.

We have continued to review our operating practices against legal and ethical expectations, including controls designed to reduce the risk of worker exploitation. We have also continued to educate employees on factors that may increase vulnerability to exploitation, including changes in immigration rules and wider labour market risks.

Anti-slavery activity remains a year-round focus. We also continue to use key awareness moments, internal communications and external channels to reinforce good practice and contribute to wider industry discussion on the threat of modern slavery.

Partnering and collaboration

Delivering on Smart's commitment to ensure that modern slavery does not occur anywhere within our business operations or supply chain requires not only internal commitment, but also external expertise, insight and collaboration.

Smart chose to partner with Hope for Justice and Slave-Free Alliance at an early stage in the development of its anti-slavery programme and continues to value these relationships.

Slave-Free Alliance is a business membership scheme run by global charity Hope for Justice. Hope for Justice was founded in the UK in 2008 with the goals of preventing exploitation, rescuing victims and restoring lives. It has since grown into an international charity working across multiple continents through prevention, rescue and restoration programmes.

Slave-Free Alliance supports businesses to develop proactive strategies to address the risk of modern slavery in their organisations and supply chains. Smart has worked with Slave-Free Alliance and Hope for Justice on several occasions to share learning and support wider business awareness of modern slavery risks and responses.

Smart is also a member of, or licensed by, the following organisations:

Indirect Procurement Human Rights Forum Waste & Recycling Working Group

The Indirect Procurement Human Rights (IPHR) Forum is a group of UK retailers, brands and manufacturers with a shared vision to protect and respect human rights in indirect goods and services supply chains.

The Waste & Recycling Working Group was formed to increase and prioritise activity addressing human rights issues within the waste and recycling sector. The group includes IPHR Steering Group members alongside stakeholders with an interest in human rights in the sector, including waste service providers, NGOs and governmental bodies.

Gangmasters and Labour Abuse Authority (GLAA)

The GLAA works in partnership to protect vulnerable and exploited workers. It is a Non-Departmental Public Body governed by an independent board.

Its role is to protect vulnerable and exploited workers through intelligence gathering and investigation of labour exploitation and illegal activity, including human trafficking, forced labour and unlawful labour provision. It works with partner organisations including police forces, the National Crime Agency and other enforcement bodies.

Stronger Together

Stronger Together is a multi-stakeholder, business-led initiative aiming to reduce modern slavery, particularly forced labour, labour trafficking and other hidden third-party exploitation of workers. It provides practical guidance, training, resources and a collaborative network for employers, labour providers and workers.

Association of Labour Providers

Established in 2004, the Association of Labour Providers (ALP) is a specialist trade association promoting responsible recruitment and good practice for organisations supplying labour into regulated and wider consumer goods supply chains.

The Social Recruitment Advocacy Group (SRAG)

Smart joined SRAG in October 2023 to work with like-minded organisations supporting individuals with barriers to employment. Since joining, Smart has continued to advocate for victims of modern slavery to be represented through education, awareness and rehabilitation support. Following achievement of the Gold Chartermark in September 2024, we have continued to build on that progress.

Supply chains

Addressing the risk of modern slavery within Smart's own operations is not sufficient on its own. Smart is also committed to identifying and addressing risks within its supply chain.

Over the last 12 months, Smart has continued to apply its supplier management processes, Supplier Code of Conduct and Supplier Evaluation Questionnaire to support scrutiny of second-tier labour suppliers and other relevant partners. This includes specific focus on anti-modern slavery expectations and the need for transparency, cooperation and improvement where required.

Ultimately, Smart expects its partners to work openly with it to identify and combat modern slavery. Smart will only trade with those suppliers who comply with its standards, or who are taking verifiable and meaningful steps towards compliance.

Policies

Smart's commitment to combating the risks of modern slavery and human trafficking across every area of its business is also demonstrated through its internal policies and standards, including:

- Preventing Hidden Labour Exploitation Policy
- Supplier Code of Conduct
- Whistleblowing Policy
- Safeguarding and escalation processes, where relevant to workforce risk and incident response

Smart also maintains a dedicated internal working group with representation from Operations, People, Shared Services and Group support functions, including IT and Finance, to help drive the programme forward.

Training and awareness

Training is delivered to all permanent Smart employees during induction and refreshed periodically through e-learning and operational communications. Training includes how to identify the signs of modern slavery, how to escalate concerns and the procedures to follow in an emergency or safeguarding situation.

Employees working in higher-risk geographical or operational areas may receive enhanced guidance or additional support informed by field intelligence and local risk factors.

Flexible employees are also made aware of the signs of exploitation and how to seek help or report concerns. Audit mechanisms are in place to support consistency and compliance.

Smart continues to use a range of communication methods to raise awareness amongst its workforce, including posters, leaflets, contact cards and other accessible materials. Where appropriate, information is translated into relevant languages and includes contact details for Hope for Justice and Smart's confidential reporting channels.

For supply chain partners, guidance relating to modern slavery risks and expectations is shared as part of the supplier evaluation and assurance process. Relevant second-tier labour suppliers are subject to compliance review and support where improvement is needed.

Remediation

Smart works with charity partners and stakeholder organisations to support individuals affected by exploitation and, where appropriate, to support access back into safe and sustainable work.

Victims may previously have worked through Smart and been relocated or supported through safeguarding pathways, or may have worked through other organisations before referral. By building relationships with specialist partners, Smart aims to provide a suitable and sensitive route into work that aligns with an individual's circumstances and rehabilitation needs.

Where possible, and where operationally appropriate, Smart will seek to support victims through suitable placements, additional training and wider employability support, including English language development where relevant.

Reporting

Smart collates and reviews data relating to indicators of potential exploitation. Reporting from internal personnel systems is used to identify duplicate or linked details such as bank accounts, addresses and next of kin information, with suspicious matches investigated further.

Smart also uses information gathered through its partnerships and operational intelligence to support identification of risks and patterns of concern. Where potential issues are identified, they are escalated and investigated in line with internal procedures.

Next Steps and Targets

Throughout the coming year, Smart will continue to focus on consistency, documentation and continuous improvement across its anti-slavery programme.

Our priorities for 2026–2027 include:

- continuing to strengthen consistency of process and procedure across the business
- further embedding documented modern slavery controls, guidance and escalation routes
- continuing to work with peers, clients and expert organisations to share learning and identify good practice
- developing the capability and visibility of key internal champions and stakeholders involved in prevention activity
- ensuring employees remain aware of the signs of modern slavery and know how to respond to concerns
- strengthening supplier assurance activity, including expectations placed on higher-risk suppliers

- continuing to improve how worker welfare risks are identified, escalated and addressed

Smart remains committed to harnessing the energy and commitment of its people as we continue this work. Our anti-slavery efforts will remain under review so that we can respond to emerging risks and improve the effectiveness of our approach over time.

Summary of Actions and Goals

To Complete 2025/2026
Update the employee handbook to contain a greater focus on MDS
Review the Supplier Code of Conduct to: - • ensure MDS related requirements are communicated in a more robust manner and expectations are clear • review statistics
Review the following policies: - • Whistleblowing • Preventing Hidden Labour Exploitation
Creation of a Modern Slavery Standard along with Employee and Manager Guide.
Review our escalation process to ensure that: • a pathway is in place to give direction to those involved in the process at the various stages • relevant stakeholders have the necessary skills, training and experience to deliver their response effectively • safeguarding processes are in place to address the needs of victims or others affected by the incident, as outlined in the incident support pack • senior management provides support during the delivery programme and addresses strategic issues
Undertake a training needs analysis to establish if additional content relating to responsible purchasing practices, supplier management, and responsible supplier exit is necessary
Formulation of a collective ESG policy and strategy
Increase the number clients engaging in quarterly or bi- annual meetings to discuss labour exploitation risks and highlight best practice
Implement worker welfare discussions as part of the tender process
Review New Supplier Set Up Evaluation Questionnaire to include a free-text section to determine how the supplier addresses the risk of MDS both in its own business and supply chain
To document a process of open-source research across all prospective suppliers, including: • Companies House Research • Certificates and industry accreditations • The GLAA public register (labour providers only), including any recent inspections • Location of operations and geographical risk of modern slavery (see global slavery index) • General Google searches for links to adverse practices

Document the entire compliance/audit process relating to non-labour providers to include, where possible:

- Desktop research – including open source and available search tools
- Supplier modern slavery evaluation questionnaire
- Desktop review – provided policies and documents
- Desktop assessment – virtual meetings with suppliers to discuss efforts
- Supplier audits – with social bolt-on
- In-depth supplier/site assessments, including site examination, managerial and process interviews, and worker discussions

Implement a management system that records who amongst the temporary labour workforce has received the refer-a-friend payment

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes the Smart Solutions (Recruitment) Limited's Modern Slavery Statement for the financial year 2026/2027.

The statement was approved by the Smart Solutions (Recruitment) Limited CEO on 24th March 2026.

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Matt Spaul
Chief Executive Officer
Smart Solutions (Recruitment) Limited