Modern Slavery Statement

For Financial Year Ending 31st December 2024

Version History & Approval

Financial Year	Approval on behalf of board of directors	Date of Approval	Director's Signature
Ending 31/12/2024	Tom Steer Commercial Director	02/01/2025	

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 31st December 2024 (FY 2024) 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 services;
- recruitment agencies to recruit permanent staff and contractors.

Policies and Procedures

We have a number of policies and procedures 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.

- **Human Rights Policy**

  A policy describing Softwire's commitment to conduct business responsibly in a way that respects the dignity and rights of our workforce and others affected by our operations. Softwire's position on human rights in the workplace is described in further detail below given its significance in relation to preventing modern slavery and human trafficking.

- **Supplier Management Policy**

  A policy to identify, assess and manage the ethical and regulatory risks associated with Softwire's supply chain.

- **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.

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 to join organisations such as trade unions and worker councils in line with applicable laws and to bargain collectively without fear of discrimination or harassment.

CSR Schemes

Softwire is proud of its schemes 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. Examples of organisations we supported in 2024 include Cambridge United Foundation and Maslow Foundation.

- **Matching of Charitable Donations**

  In 2024, Softwire matched £18,915.96 of charitable donations by our staff.

- **Payroll Giving**

  Employees have the option to sign up to a payroll giving scheme which enables employees to make regular tax-free donations to charity through payroll. A total of 48 people signed up in 2024 with collective donations of £113,903.50.

- **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 of their choice. In 2024, 86.5 days of charity holidays were taken by staff to help support causes such as blood donation, schools outreach, Lambeth Foodbank web development work, green space conservation work and assisting the Positive Ageing service at Blackfriars Settlement.

- **CSR Activities**

  In 2024 Softwire sponsored 2 employees to receive training to be mentors for the programme run by the charity You Make It. The objective of the programme is to help empower young unemployed/underemployed women from racialised communities with confidence, skills and networks to reach their full potential. It has been decided to make this an ongoing scheme following positive feedback.

  In addition to the above, Softwire carried out a group volunteering scheme for Little Village in aid of families with babies and young children living in poverty.

  We have organised direct fundraising events to support charities and appeals, raising £18,915.96 in 2024. This amount was matched by Softwire and, with the addition of staff donations, this takes the total raised to £42,249.91. Examples of the events include a charity quiz, auction, raffles, fundraisers for Black History Month, and a medical supplies fundraiser for Ashanti Development.

- **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 and locally sourced milk is hand delivered so that the local community directly benefits from our presence. The fishmonger, and bakeries we purchase from are committed to reducing the length of their supply chains. Softwire's Manchester office procures soft drinks from companies that do all production and canning locally, reducing the risk of exploitation found in complex or outsourced operations.

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 2024. For each service provider we recorded an individual risk assessment, the actions taken to manage the risk, and any concerns we have in relation to 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. Each year, employees are asked to confirm that they have read and understood Softwire's policies and statements on business ethics.

Self-Assessment

The table below records our assessment of the progress we have made in FY 2024 in implementing and following procedures to prevent modern slavery and human trafficking in our supply chain.

Action	**Progress**
Perform supplier sector-level risk assessment (FY 2024)	Completed
Perform individual service provider risk assessments (FY 2024)	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
Regularly inform Board of Softwire of progress with this statement	Completed
Remind employees 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.	Completed
Create training materials to explain the risks of modern slavery to employees (slide deck and recording)	Completed
Update Softwire's Whistleblowing Policy	Completed

Appendix 1

Sector-Level Assessment of Suppliers

Service Provider	Level of Risk	Actions
Contractors, Subcontractors and Business Service Providers	Low risk • due to the highly skilled nature of the services	Despite the finding of low risk, given that this is our largest supplier sector, actions include the following: • Request execution of Softwire's standard contract which includes modern slavery clause and Supplier Code of Conduct • Negotiate inclusion of modern slavery clause and Supplier Code of Conduct in non-standard contracts
Professional Advisors	Very Low risk • due to the highly skilled nature of the services and professional status.	• Review advisors' websites and terms of business to check for commitments to prevent modern slavery and human trafficking • Make a further detailed assessment of advisor if commitment is not clear
IT & Office Infrastructure Providers	Low Risk • Suppliers of IT infrastructure are generally large organisations required to publish an anti-slavery statement	• Review providers' websites and terms of business to check for commitments to prevent modern slavery and human trafficking • Make a further detailed assessment of provider if commitment is not clear
Office Service Providers (e.g., cleaners and paper recyclers)	Moderate Risk • due to the nature of the work, high staff turnover and prevalence of agency workers within the sectors	• Email service providers asking them to confirm compliance with our Supplier Code of Conduct
Providers of Consumables	Low Risk • Providers of consumables are generally large	• Review providers' websites and terms of business to check for commitments to prevent modern slavery and human trafficking

	organisations required to publish an anti-slavery statement	• Make a further detailed assessment of provider if commitment is not clear
Recruitment Agencies	Moderate Risk • Recruiters may use third parties or engage staff in jurisdictions with a higher risk for modern slavery	• Review agencies' websites to check for commitments to prevent modern slavery and human trafficking • Request execution of Softwire's standard contract which includes modern slavery clause and Supplier Code of Conduct • Negotiate inclusion of modern slavery clause and Supplier Code of Conduct in non-standard contracts • Send questionnaire to recruiters regarding compliance with Modern Slavery Act 2015 requesting a commitment to comply with Supplier Code of Conduct ○ Based on feedback, make a further assessment if necessary