



# **Modern Slavery and Human Trafficking Statement 2024-2025**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") and sets out the steps that **Smart Talk UK Ltd** has taken to ensure that slavery and human trafficking is not taking place in our business or within our supply chains during the financial year **30-04-25**

## **1. Introduction and Commitment**

Smart Talk UK Ltd is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We believe that all workers should be treated with dignity and respect and have a zero-tolerance approach to modern slavery. We are dedicated 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 our supply chains.

## **2. Organisational Structure and Supply Chains**

SMART TALK UK Ltd is a UK-based company specialising in the export and wholesale distribution of electronic goods, including tablets, gaming consoles, mobile devices, accessories, consumer electronics, and IT components. Our operations are based in London, UK where our direct workforce is employed in roles such as procurement, sales, administration, and logistics.

Our supply chain is based in the UK and includes:

- **Distributors and Premium Resellers:** Purchasing goods via distributors, premium resellers, retailers and local trading companies.
- **Logistics and Shipping Providers:** Utilising third-party services for warehousing, shipping, and delivery. We also use our own warehousing and packaging.

We acknowledge that the electronics sector has complex, multi-tiered supply chains that often span various countries, some of which may carry a higher risk of labour exploitation.

## **3. Policies in Relation to Slavery and Human Trafficking**

We operate the following internal policies that support our commitment to tackling modern slavery:

- **Anti-Slavery and Human Trafficking Policy:** Our core policy outlines our stance on modern slavery and expected standards of conduct for all employees and suppliers.

- **Whistleblowing Policy:** We provide a confidential mechanism for employees to raise concerns about potential wrongdoing, including any suspicion of modern slavery, without fear of retaliation.
- **Employee Code of Conduct:** This sets out the ethical standards expected of all our employees.
- **Supplier Code of Conduct:** This explicitly requires all our suppliers to comply with all applicable labour laws and international standards.
- Our policies are reviewed periodically and communicated to relevant staff and business partners.

#### 4. Due Diligence Processes

We integrate due diligence into our procurement and supplier management activities. Our processes include:

- **Supplier Vetting:** For new suppliers, we conduct due diligence checks which may include reviewing their own modern slavery statements and certifications.
- **Contractual Requirements:** Our contracts with suppliers include specific clauses that require compliance with the Modern Slavery Act 2015 and allow us the right to audit and terminate the relationship in the event of a breach.
- **Leveraging Brand Due Diligence:** We primarily source from major electronics brands who conduct extensive supply chain auditing. We review their publicly available information to ensure alignment with our ethical standards.

#### 5. Risk Assessment and Management

We assess and manage the risk of modern slavery in our business by:

- **Mapping Risks:** We focus on geographical risks and specific sectors. We consider our internal operations to be low risk due to transparent HR practices and adherence to UK employment laws. The primary risk is identified within international electronics manufacturing supply chains (Tiers 2 and below).
- **Prioritisation:** We priorities enhanced scrutiny on suppliers of unbranded goods or those operating in countries with known high risks of forced

labour, using resources like the Global Slavery Index to inform our decisions.

- **Remediation:** We have clear procedures for investigating any reports of modern slavery. Should any instances be identified, we commit to working with suppliers to resolve issues or, if necessary, terminating contracts and notifying appropriate authorities.

## 6. Key Performance Indicators (KPIs)

We monitor the effectiveness of our actions through the following KPIs:

- **100% completion rate** for mandatory modern slavery awareness training for all procurement and HR staff.
- **Number of new high-risk suppliers vetted** using our enhanced due diligence procedures during the financial year.
- **Zero verified instances** of modern slavery or human trafficking found within our operations or primary supply chain.

## 7. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant staff. This training covers:

- Awareness of modern slavery indicators.
- How to report concerns internally (whistleblowing procedures).
- Our specific policies and due diligence requirements for suppliers.

## Approval

This statement covers the financial period 01-05-2024 to 30-04-2025.

This statement was approved by the Board of Directors on 16/10/2025

Signed: 

**Name: Khallid Patel**

**Position: Managing Director**

**Date: 16-10-25**