

Modern Slavery Policy

Softcat plc

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Policy Owner – Luke Thomas, Company Secretary

Introduction

Softcat plc is committed against modern slavery or human trafficking in our supply chain or any part of our business. We will therefore not tolerate forced, bonded or compulsory labour, human trafficking, debt bondage and other kinds of slavery within our own operations or within our supply chain and we are committed to taking appropriate steps to ensure that everyone who works for Softcat – in any capacity – benefits from a working environment in which their fundamental rights and freedoms are respected.

Softcat publishes a modern slavery statement annually, this can be accessed at [Modern Slavery Statement | Softcat](#) .

1. Policy statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Softcat adheres to all local and national laws, and we expect the same high standards from all our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, compulsory overtime, any threat of violence, harassment and intimidation, discrimination, and confiscation of workers identification documents. All employees must have freedom of movement, freedom of association and they must be free to terminate their employment. We do not use recruitment agencies that charge individuals recruitment fees, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. About this policy

- 2.1 The purpose of this policy is to:
- (a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
 - (b) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.
- 2.2 This policy applies to all persons working for us or on our behalf in any capacity, including employees agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 2.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. Responsibility for the policy

- 3.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 The Company Secretary has primary and day-to-day responsibility for oversight of this policy, monitoring its use and effectiveness.

3.3 Management who have been identified in the business where there may be a higher risk of modern slavery are responsible for ensuring they understand and comply with this policy and are given adequate and regular awareness and / or training on it and the issue of modern slavery in supply chains.

4. Your responsibilities and how to raise a concern

4.1 You must ensure that you read, understand and comply with this policy.

4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.3 You must notify your manager or use the [speak-up helpline](#) as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.

4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

4.5 If you believe or suspect that a breach of this policy has occurred or that it may occur, you must notify your manager or the Company Secretary (cosec@softcat.com) or report it in accordance with our Whistleblowing Policy as soon as possible.

4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Company Secretary.

4.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Company Secretary immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure.

5. Training and communication

5.1 From 2025, training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and targeted refresher training will be provided as necessary for managers who have been identified in the business where there may be a higher risk of modern slavery.

5.2 Our zero-tolerance approach to addressing the issue of modern slavery in our business and supply chains is included in our [Supplier Code of Conduct](#) so that it is communicated to all suppliers etc at the outset of our business relationship with them.

6. Breaches of this policy

- 6.1 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 If a supplier cannot comply with this policy, our approach is to maintain a dialogue and develop an action plan with the supplier with the aim of bringing their procedures and policies in line with the standards that Softcat upholds.