

Softcat plc

Modern slavery statement

Introduction

The Modern Slavery Act 2015 (the 'Act') requires each business with an annual turnover of over £36m to publish a transparency statement which sets out the steps they have taken to ensure there is no modern slavery in their own business and in their supply chains. This statement is made pursuant to the Act.

Softcat plc is committed to ensuring that there is no 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.

Key areas of focus for 2025

- Even though we consider ourselves to be at low risk of the potential for modern slavery or human trafficking, we will conduct further reviews of our key suppliers to ensure their policies and actions align with our policies. Where our key suppliers have published information about their supply chains, we will review these to enhance our understanding and gain greater comfort on our supply chain.
- Provide our employees access to modern slavery training and awareness and to identify the indicators of modern slavery.
- Closer liaison with employees who are involved in engaging suppliers to ensure suppliers understand our stance on modern slavery.
- Providing training and support to key employees who are directly involved in areas where there may be a higher (albeit minor) increased risk of modern slavery.

Our structure

Softcat plc is a company incorporated in the UK with three subsidiary companies. Two subsidiary companies are incorporated in the United States of America (USA) and one in Germany. Our customers are predominantly located in the UK and Ireland. The branches Softcat has established (Singapore, Australia, Hong Kong, USA, Ireland and the Netherlands), and our USA and Germany



subsidiaries, help our UK and Irish customers deploy technology solutions across their organisations.

We provide corporate and public sector organisations with software licensing, workplace technology, networking and security, and cloud and datacentre. We do not manufacture hardware, develop bespoke applications or specialise in any industry-specific vertical application but we can partner with third party organisations for these requirements. The majority of our business comes from the small to medium-sized business segment and public sector customers. We also serve large enterprise customers and the corporate mid-market.

We have approximately 2,600 employees, nearly all of whom work in the UK, Ireland or USA.

Employment – workforce

Our employees are at the heart of our business and help to drive Softcat's continued success. The majority of the Softcat workforce are highly-skilled full time employees. We treat our employees in a fair, lawful and professional manner and provide for fair working conditions, including health and safety, holiday entitlements and benefits.

Softcat's Human Resources team handle the robust recruitment processes which are taken in line with employment laws. These processes include:

- 'right to work' document checks;
- contracts of employment, available to the employee at all times clearly stating employee rights and entitlements;
- checks to ensure everyone employed is 16 and above; and.
- payment of agency fees to the recruitment company. Prospective employees do not pay to commence employment.

The following steps also ensure that we treat our employees well and mitigate any risks associated with modern slavery:

- We make sure our employees are aware of their contractual and statutory employment rights.
- Overtime is allowed for certain roles but is not excessive. Where overtime is required, this is considered and pre-approved by a line manager.
- We are committed to providing equal opportunities for all candidates and employees.
- Market-related pay and rewards are reviewed annually.
- We do not use recruitment companies that charge prospective candidates a fee.
- We are an accredited Real Living Wage Employer.

Risk of modern slavery

We consider and address circumstances where there may be a higher risk of modern slavery in our operations, the risk of modern slavery is predominantly associated with:

- Suppliers supporting our offices (contracted cleaners). We work with our office cleaning agencies to ensure that all contracted cleaners receive a real living wage and all the agencies we use have confirmed that they meet pay requirements for minimum wage; and
- In our supply chain, the risk of modern slavery and child labour is predominantly associated with indirect suppliers operating in countries where there is a high volume of foreign migrant labour and a lack of legal protection and/or enforcement of protections for migrant labour or in respect of child labour. Specific risks of modern slavery associated with migrant workers can include payment of recruitment fees, retention of worker passports, lack of an employment contract in a language the worker understands, and failure to provide return transportation to the country of origin. Where published we review the risk assessments and the audits carried out by our largest suppliers. All suppliers are required to conform to [Softcat's Supplier Code of Conduct](#) to evaluate their suppliers (our indirect suppliers).

Policies and training

Softcat has a number of formal internal policies and procedures and it is important that we uphold high standards across our business. [Softcat's modern slavery policy](#) outlines how we address issues relating to modern slavery and human rights risks and shows our commitment to maintaining high ethical standards. The modern slavery policy will be reviewed annually to make sure it remains relevant and up to date and that it continues to provide the right guidance for our stakeholders.

We are conscious that potential human rights risks exist within any business and supply chain, including labour risks. Our approach to preventing modern slavery forms part of our wider corporate responsibilities, for which I am responsible as CEO. We adopt procedures that contribute to ensuring modern slavery does not occur in our business or supply chains. As part of our onboarding process, we use a third-party screening tool to review our suppliers, and we expect organisations with whom we do business to adopt and enforce policies to comply with relevant legislation. Where our largest suppliers publish reports on their supply chain, we review these to better understand our supply chain map and to gain comfort on the controls those suppliers have in place to mitigate risks in their own supply chain.

Softcat's employee handbook (which is our code of conduct) provides a framework which summarises some of the key expectations and behaviours we expect from all Softcat employees and those who work on behalf of Softcat. Our employee handbook requires all of us to act ethically and we expect employees to always comply with legal requirements, putting our values into practice in everything we do.

Softcat's [Supplier Code of Conduct](#) outlines our expectations for responsible purchasing practices and the fair treatment of workers across our supply chain, including but not limited to a zero-tolerance towards modern slavery, child labour and human trafficking, and a commitment to anti-

discrimination and fair working hours and payment. Contracted suppliers must comply with applicable standards, laws and regulations as well as Softcat's Supplier Code of Conduct. The Supplier Code of Conduct also provides a safe route for suppliers to raise concerns.

Softcat's modern slavery policy sets out our responsibilities and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking. Softcat policies are supported by E-learning training and awareness resources, which are available to all employees. The training equips employees with the knowledge to understand and identify the signs of modern slavery and human trafficking and how to raise concerns.

We have a Whistleblowing policy (speak-up) which is reviewed annually. The [speak up hotline](#) enables anyone who has concerns (for example, how suppliers, customers, partners or employees behave) to raise their concerns either by raising this with their line manager, a member of the management team or confidentially via an independent third party. We respond promptly to any concerns raised through the speak up channel, including initial acknowledgement within two business days.

Our supply chain

Softcat continually works to identify and mitigate potential human rights risks linked to our business. We do not have direct business relationships with our indirect suppliers. Having reviewed our major suppliers' modern slavery statements, we consider our indirect supply chain to be an area where the risk of modern slavery may occur. In view of this, we conduct a desktop review of our major suppliers annually to ensure that their policies align with our policies on modern slavery. From 2025, we aim to conduct an annual risk assessment of our major suppliers to identify any actual or potential human rights risks which may be directly linked through a business relationship and to ensure that actions if required are put in place to deal with any potential risk identified.

We adhere and promote adherence to all aspects of human rights within our organisation and we expect the same level of commitment from all of our suppliers. As a business, we utilise our Supplier Code of Conduct and our Modern Slavery policy to promote conformance to applicable laws.

We partner with more than 400 different hardware and software vendors to bring the latest and broadest range of technology to our customers, as well as numerous specialist service providers to augment the services provided by our in-house teams. We consider the risk of modern slavery from these vendors to be low. We ensure that other areas in the supply chain which may be at higher risk of modern slavery (for example the supply of merchandising products) are ethically sourced.

Risk assessment

Given the nature and locations of our business and operations, we consider ourselves to be at low risk of the potential for modern slavery or human trafficking. Furthermore, our revenues are

predominantly derived from countries deemed low risk by conventional sustainability indices, such as *The Global Slavery Index* (<https://www.walkfree.org/resources/>). We also believe that Softcat's business model and strategy is unlikely to create material risks of slavery and trafficking.

Due diligence

As part of our initiative to identify and to mitigate risk:

- We assess our business operations to ensure that there is no employee issues associated with modern slavery.
- We provide modern slavery training to our employees during induction.
- We provide targeted training and awareness to relevant staff on identifying modern slavery indicators e.g human resources, payroll and facilities staff.
- We have sought confirmation from our top suppliers in terms of spend, (who work for us providing products and /or services for our own business use), of their compliance with the Act.
- We operate a Supplier Code of Conduct which addresses the labour rights issues associated with modern slavery and sets out the values and standards we expect of our suppliers. Suppliers must agree to comply with the Code as part of our on-boarding process, ensuring a minimum standard is required by our direct suppliers. If a supplier cannot agree to comply with our Supplier Code of Conduct, our approach is to maintain a dialogue and develop an action plan with the supplier in question with the aim of bringing their procedures and policies in line with the standards that Softcat upholds.
- We review the public disclosures of our largest vendors in respect of their practices to mitigate the risk of modern slavery to ensure they align to our values.
- We have processes to check we comply groupwide at all times with all legal minimum wage requirements.
- In 2025, we published our modern slavery policy which will be available internally and with all external stakeholders. The policy will be reviewed annually.

KPIs

We monitor a variety of key performance indicators (KPIs) to ensure we effectively manage the risk of modern slavery. These include:

- Mandatory modern slavery training to all employees during induction.
- Board review and approval of the modern slavery statement annually. Statement is available on the [homepage of the Softcat website](#).
- E-learning training and awareness resources made available to all employees.

- Independent whistle blowing policy and a speak up line in place. There were no alerts raised in the last year about the presence of modern slavery in our business or supply chain.
- Desktop review of our top 15 – 20 vendors (relating for the majority of our gross profit), distributors and relationship banks to consider if there are any concerns of modern slavery or human rights. No such concerns were found.
- Review of the supply chain reports (where published) of our top 10 vendors.
- We follow good practice in our purchasing processes and purchasing terms are mutually agreed by us and our suppliers, so that undue pressure on suppliers is not created. We commit to good supplier payment practices and [we publish our supplier payment performance](#).

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 July 2024. It was approved by the Softcat plc Board with effect from 31 January 2025 and signed on its behalf by:

A handwritten signature in black ink, appearing to read 'G. Charlton'.

Graham Charlton, Chief Executive

31 January 2025