Modern Slavery Policy

Business Confidential

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Introduction

One of the Safe2Drive's core values is to uphold responsible and fair business practices. It is committed to promoting and maintaining the highest level of ethical standards in relation to all its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. The Company therefore has a zero-tolerance policy towards Modern Slavery and is committed to acting fairly and with integrity in all its business dealings and relationships and implementing and enforcing effective systems to counter Modern Slavery.

Policy Statement

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 to exploit them for personal or commercial gain.

Safe2Drive Solutions Ltd has 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 implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business. We expect the same high standards from all our contractors, suppliers and other business partners. As part of our processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time. RESPONSIBILITY FOR THE POLICY is the Data Protection Officer (DPO) who has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with Safe2Drive's Managing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training. COMPLIANCE WITH THE POLICY You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chain 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.

You must notify your manager OR Safe2Drive's Data Protection Officer (DPO) as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

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 chain constitutes any of the various forms of modern slavery, raise it with your manager or the Data Protection Officer (DPO).

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 part of our supply chain.

If you believe that you have suffered any such treatment, you should inform your manager or the Data Protection Officer (DPO) immediately.

COMMUNICATION AND AWARENESS OF POLICY Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be provided where required.

Zero Tolerance

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. BREACHES OF THIS POLICY Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Managing Risk

Safe2Drive has examined its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk

If a specific case of modern slavery is identified here in the Safe2Drive , it should be reported to the police immediately on 101. If potential victims are in immediate danger the standard 999 emergency number should be used.

Training

When training employees takes place in Safe2Drive, we empower the team and individuals to

identify the signs of modern slavery and to flag up potential issues, you should inform them about the Modern Slavery Helpline on 0800 0121 700 allowing anyone who thinks they may have come across an instance modern slavery or indeed who may have been a victim themselves to call for information and guidance on what to do next.

Managing Standards

Safe2Drive has does not engage with any business who does not have an effective way in ensuring that slavery and human trafficking is not taking place in its business or its supply chain. Safe2Drive reviews its supply chain annually as a measure to ensure its performance is measured against the its standards which it considers appropriate.

Modern Slavery Risk Assessment

Safe2Drive conducts periodic assessments of the risk of modern slavery and human trafficking within its operations and supply chain.

Assessment Summary

- **Business Activities:** UK-based software and managed services provider.
- **Geographical Risk:** Low. Operations are primarily conducted within the United Kingdom.
- **Employment Risk:** Low. Employees are recruited and employed in accordance with UK employment law and regulatory requirements.
- **Supply Chain Risk:** Low. The company primarily uses established UK-based technology, professional services and infrastructure providers.
- **Controls Implemented:**
    - Modern Slavery Policy.
    - Supplier due diligence procedures.
    - Ethical procurement practices.
    - Reporting and escalation mechanisms.
    - Management oversight and periodic review.

Overall Risk Rating: Low

Review Period: This assessment will be reviewed annually or following any significant change to business operations or the supply chain.

This policy is reveiwed annualy in accordance with ISO27001