

# Smartcall Technologies Policy Statements

## Modern Slavery

The Modern Slavery Act 2015 by and large imposes obligation on companies to ensure that no individual suffers any form of coercion or slavery and requires them to ensure that their supply chain does not compromise these obligations.

Our responsibilities under the Modern Slavery Act 2015 are met by our hiring procedures where we check that any individual we hire is either a UK National or has the right to live and work in the UK, that we have checked their Criminal Record with the CRB and that they have a full Driving Licence (checked annually).

Clearly if we meet any person who does not meet the above requirements then we would make the authorities aware.

Our responsibilities under the Act with respect to our supply chain is met by our only buying (services, servers, H/W) from substantial suppliers whose turnover exceeds £36m and are thus subject directly to the Act. In the event that a supplier's turnover is less than £36M then we will take reasonable steps to scrutinise them appropriately before accepting any goods or service.

## Anti-Bribery

You may not without prior written consent of the company offer, make or accept any gift or payment of any kind to or from any prospective, current or past customer, client or supplier of the company.

You should be aware that the Bribery Act 2010 covers the criminal law relating to bribery. The Act repeals all previous statutory and common law provisions in relation to bribery, instead replacing them with the crimes of bribery, being bribed, the bribery of foreign public officials, and the failure of a commercial organisation to prevent bribery on its behalf.

The penalties for committing a crime under the Act are a maximum of 10 years' imprisonment, along with an unlimited fine, and the potential for the confiscation of property under the Proceeds of Crime Act 2002, as well as the disqualification of directors under the Company Directors Disqualification Act 1986. The Act has a near-universal jurisdiction, allowing for the prosecution of an individual or company with links to the United Kingdom, regardless of where the crime occurred.

## Equality

We recognise that discrimination is unacceptable and although equality of opportunity has been a long standing feature of our employment practices and procedure, we have made the decision to adopt a formal equal opportunities policy. Breaches of the policy will lead to disciplinary proceedings and, if appropriate, disciplinary action.

The aim of the policy is to ensure no job applicant, employee or worker is discriminated against either directly or indirectly on the grounds of race, colour, ethnic or national origin, religious belief, political opinion or affiliation, sex, marital status, sexual orientation, gender reassignment, age or disability.

We will ensure that the policy is circulated to any agencies responsible for our recruitment and a copy of the policy will be made available for all employees and made known to all applicants for employment.

The policy will be communicated to all private contractors reminding them of their responsibilities towards the equality of opportunity.

The policy will be implemented in accordance with the appropriate statutory requirements and full account will be taken of all available guidance and in particular any relevant Codes of Practice.

We will maintain a neutral working environment in which no employee or worker feels under threat or intimidation.

## Diversity

Covered under Equality above

## Child Labour

We adhere to the UK Laws regarding children in the workplace. The Company will not tolerate the use of unlawful child labour or forced labour in the manufacture of products it sells and will not accept products or services from suppliers, subcontractors or business partners (collectively referred to as "Suppliers") that employ or utilise child labour or forced labour in any manner. The Company's Suppliers shall not employ or utilise in any manner any individual below the minimum employment age set by national law.

## Environmental

We maintain a policy of "minimum waste" which is essential to the cost-effective and efficient running of all our operations and we aspire to meet the aims of ISO 14001 in the operation of our business

## Health & Safety

Smartcall believes that one of its most important functions is the prevention of accidents and ill health. We do not wish any of our employees or any other person to suffer as the result of our activities or work processes. To this end, we intend to comply rigorously with all Health and Safety Legislation.

The Health and Safety Handbook outlines the ways in which we intend to meet our legal responsibilities and all staff should be familiar with the contents.

Legislation requires that, as an employer, we prepare a statement of General Policy with respect to the Health and Safety of our employees, together with details of the organisation and arrangements that we have set up to carry out that Policy.

Therefore, we provide, so far as is reasonably practicable:

- a safe place and systems of work with safe handling and transport of plant and equipment

- our installations use safe products and equipment for our and our customers use

- adequate training, instruction, information and supervision

- a safe and healthy environment with adequate welfare facilities.

We also ensure, so far as is reasonably practicable, that the way we carry out our work does not affect the Health and Safety of non-employees such as visitors and contractors.

We remind you, our employees, of your duty to look after your own Health and Safety and ensure that you do not endanger others and that you must co-operate with us, your employer, in meeting our legal obligations.

To achieve this we intend to enforce appropriate measure to control and monitor health and safety procedures as a vital part of ensuring efficient and successful operations. To this end we intend to:

- Ensure that all reasonable steps are taken to ensure the health, safety and welfare of all those affected by our activities isn't put at risk.

- Provide such information, instruction, training and supervision necessary to ensure the health and safety of our employees.

- Safeguard the Health and Safety of our visitors and sub-contractors.

- Consult with our employees in respect of our Health and Safety procedures and risk assessments.

- Ensure all employees are mindful of their health and safety responsibilities and are monitored in the work place.

Smartcall's Managing Director is ultimately responsible for health and safety matters, however, the management of health and safety along with individual responsibilities for all staff is outlined in this Handbook.