

## **MODERN SLAVERY STATEMENT (MSS) 2022**

### **Introduction**

Modern slavery is a crime resulting in an abuse and gross violation of human rights. ScienceTech Ltd recognises the reality of modern slavery and this statement highlights the steps it takes to ensure compliance with the Modern Slavery Act 2015 and to show its dedication to ensuring that slavery and human trafficking is not found in its supply chain or any other part of the business. ScienceTech Ltd expects its suppliers to respect and follow this statement as a contract. We promote ethical business practices and policies that protect workers from being abused and exploited in its own organisation and in its supply chains.

### **Company Background, Business Model and Supply Chain relationships**

ScienceTech Ltd is the UK based data services and data solutions company specialising in Data Enablement, Data Management and Data Analytics services. ScienceTech Ltd is a limited company as defined by the Companies Act 2006 and is privately owned by its directors. Being a small data consultancy company ScienceTech Ltd provides its services directly by its employees, who are also founders of the company and where necessary by the recruitment of independent contractors or by partnering up with the technology suppliers.

ScienceTech Ltd supply chain mostly consists of independent contractors working in the white-collar IT sector. During the current reporting period, ScienceTech has not engaged any independent contractors or used the services of technology partners. This can be attributed to the global impacts of the Covid-19 pandemic on the businesses during the past two years. However, we recognise that there is no room for complacency and will continue to work to enhance our policies and procedures and measure awareness within our business.

### **Risk Assessment and Due Diligence**

Modern slavery is defined as including eight types of serious exploitation:

- trafficking in persons,
- slavery,
- servitude,
- forced marriage,
- forced labour,
- debt bondage,
- the worst forms of child labour, and
- deceptive recruiting for labour or services.

ScienceTech Ltd has a zero-tolerance approach to modern slavery. We are committed to mitigating the risk of modern slavery occurring within our business or supply chain.

We have assessed our direct workforce as being of low risk to modern slavery, and rely on our people and policies to further mitigate this risk. Accordingly, we consider that our greatest risk of involvement in modern slavery is being indirectly linked to it through our supplier relationships.

ScienceTech Ltd's approach to assessing and addressing modern slavery risks in our operations and supply chains is based on three key principles:

1. Build meaningful relationships with partners – this includes partnership up and down the supply chain.

2. Adopt a risk management approach, both internally and with our suppliers to identify high risk areas where modern slavery could be present, and evaluate and monitor these risks.
3. Recognise the leverage we have to influence change. Consider how our own business practices could influence and contribute towards inappropriate practices such as where supplier prices are unusually low.

Where relevant, all potential new suppliers are required to provide written confirmation that they are compliant with the Modern Slavery Act 2015. If they are unable to provide a written statement, we will review whether the supplier is to be invited to enter a contractual relationship with ScienceTech Ltd.

Our clients are large multinational companies or public sector bodies who have their own ethical standards of behaviour in place. Where reasonably practicable, we are inspecting client sites to complete Work Health and Safety assessments. This ensures the working conditions of our clients meet the standard expected under statutory requirements. Where any working conditions are assessed as being substandard, ScienceTech Ltd engages with the stakeholder to ensure appropriate measures are taken to mitigate any risks that can be associated to modern slavery. This may involve educating the relevant stakeholder of the issue that may need to be rectified.

All our spend commitments are made using written contracts and we do not pay cash for services.

### Training and Awareness

In order to ensure awareness and a high level of understanding of ScienceTech Ltd.'s zero-tolerance approach to modern slavery, we will be introducing dedicated training modules which will ensure all levels of employees, from senior management, independent contractors and other colleagues are trained in how to implement our policies and identify forced labour in practice.

### Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-Bribery & Anti-Corruption Policy;
- Bullying & Harassment Policy;
- Code of Conduct;
- Equal Employment Opportunity & Anti-Discrimination;
- Risk Management Policy;
- Work, Health & Safety Policy Statement and
- Whistleblowing Policy.

All our employees and contractors are required to comply with the above policies and Code of Conduct. Breaches of our policies or Code of Conduct may be regarded as misconduct, which can lead to disciplinary action including termination of employment or engagement.

### Board Approval

This statement has been approved by the Board of Directors. The statement will be reviewed and updated as appropriate on an annual basis.



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Vugar Sagiyeu  
Managing Director

28<sup>th</sup> January 2022