

Policy Statement

We, Kieser Consultancy Limited trading as SMS Speedway have a zero-tolerance approach to Modern Slavery and Human Trafficking in all its forms. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. This policy applies to all persons working for us, or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, external consultants, third-party representatives, and business partners (collectively “Workers”).

Commitment

This policy is established in accordance with the Modern Slavery Act 2015 (UK) and is informed by the principles of the UN Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organisation core conventions. Modern Slavery encompasses the crimes of: Slavery, Servitude, Forced or Compulsory Labour and Human Trafficking

Responsibility and Governance

The Directors and Senior Leadership Team have the overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all Workers comply with it.

Management has primary day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with queries, and auditing internal control systems and procedures.

All Workers must read, understand, and comply with this policy and notify the Company immediately if they suspect or are aware of a conflict with this policy. Training is mandatory for all staff.

Risk Assessment and Due Diligence

The Company commits to a process of continuous identification, assessment, and mitigation of modern slavery risks in its operations and supply chains.

Organisational Risk Assessment: We conduct an annual assessment of the risk of modern slavery in our business, paying particular attention to:

- High-Risk Geographies: Countries identified as having a high prevalence of modern slavery.
- High-Risk Sectors: Functions/sectors known to rely heavily on low-skilled or transient labour (e.g., outsourced cleaning, security, facilities, or distant manufacturing tiers).

Recruitment Processes: Focusing on third-party agencies and 'employer pays' principles to ensure no recruitment fees are borne by the worker.

Our due diligence includes:

Supplier Onboarding: Requiring all new suppliers to complete an anti-slavery questionnaire, acknowledging and agreeing to our Supplier Code of Conduct, and providing evidence of their own compliance measures (including publishing a Modern Slavery Statement where legally required).

Contractual Clauses: Incorporating robust anti-slavery clauses into all contracts, requiring suppliers to communicate equivalent clauses to their sub-contractors and giving the Company the right to audit and terminate for non-compliance.

Reporting, Training, and Remediation

Grievance and Whistleblowing Mechanisms

- We maintain a safe, confidential, and accessible mechanism for Workers and external stakeholders (including supply chain workers) to report concerns. The Whistleblowing Policy provides a clear process for reporting without fear of reprisal. Reports related to modern slavery will be investigated promptly and sensitively by a management appointed representative.

Victim-Centred Remediation

- If an instance of modern slavery or a high-risk violation is identified, our priority will be the well-being and safety of the victim/worker. Our remediation process is victim-centred, focusing on non-retaliation and providing access to remedy, support services, and safe employment where appropriate.
- We will avoid 'knee-jerk' reactions (such as sudden contract termination) that could inadvertently cause further harm to victims or lead to greater risks of modern slavery in the supply chain.
- We will cooperate fully with law enforcement agencies.

Training and Awareness

- We are committed to building capacity and awareness among our Workers:
 - Mandatory Training: All staff must complete annual modern slavery awareness training.
 - Communication: This Policy and the signs of modern slavery will be communicated clearly and regularly across the organisation.

Monitoring and Effectiveness

Recording of the following will be used in KPI reporting

- Training Completion per year by individuals is recorded.
- Suppliers who have been successfully risk-assessed and/or audited.
- The number of modern slavery or human rights concerns raised through internal and external channels and the average time to resolution.

Annual Statement

The Company will, if required under Section 54 of the Modern Slavery Act 2015 (i.e., turnover of £36 million or more), publish an annual Modern Slavery Statement. This statement will be approved by management, signed by a Director, and published prominently on the Company website within six months of the financial year-end. This does not apply to Kieser Consultancy Limited however we will review our policy on an annual basis and update when required to e.g. due to legislative changes.

This policy is managed by P Kriek and reviewed on an annual basis - last reviewed December 2025

Signed: P Kriek