



CyberSmart

Modern Slavery Policy Statement 2023

v1.6

Introduction

This statement sets out CyberSmart's actions to understand all potential modern slavery risks related to its business and to put in place steps that ensure there is no slavery or human trafficking in either our own business or supply chains.

1. The purpose of this statement

This statement has been approved by the Board of CyberSmart Ltd, and is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31st December 2022.

CyberSmart recognises that slavery and human trafficking is a real, but an often hidden issue in our society and that its impacts on individuals, families and communities are unacceptable. Whilst the company does not meet the statutory requirements that demand a statement, we want every member of our extended team to feel excited about working alongside us, and that their hard work is recognised, appreciated and makes a difference. We will always act ethically, honestly and in full compliance with the law and regulations. We have a zero tolerance approach to any of modern slavery and are committed to implementing effective policies and processes to safeguard against any form of modern slavery or human trafficking in our business and supply chain.

2. Who we are

CyberSmart is a service-led, SaaS business supporting the improvement of cybersecurity practice and certification for the SME business sector. For more information, you can visit our website <https://cybersmart.co.uk/>

References to ("we" "us" or "our") in this statement are references to CyberSmart Limited.

Our company registration number is 10088945

Our VAT registration number is GB269644360

Our registered office is at Second Home, 68-80 Hanbury Street, London, E1 5JL

3. Organisational structure and supply chain

The business:

- Designs and develops cloud-based software to deliver certification services
- Designs and develops deployed applications that monitor ongoing compliance with cybersecurity certification schemes.

4. Policies

CyberSmart maintains and regularly reviews internal policies to ensure it conducts business in an ethical and transparent manner. These policies include, but are not limited to:

- Procurement Policy:

We are committed to ensuring that our suppliers adhere to the highest standard of ethics. Suppliers are required to demonstrate they provide safe working conditions where necessary, treat their workers with respect and dignity at all times, and act ethically and within the law. All suppliers are required, where they meet the regulatory threshold, to have an equivalent Modern Slavery Policy in place and maintained by periodic review.

- Contract for the supply of recruitment services:

We only contract with reputable employment agencies to source our people, and we always verify any new agency before initiating business with them. All recruitment agencies are required to sign our contract for the supply of recruitment services, which includes a clause requiring they comply with the Modern Slavery Act 2015.

We operate a robust recruitment policy, conducting eligibility to work in the UK and reference checks for all employees to safeguard against human trafficking of individuals, and to guard against any individual being forced to work against their will.

- Whistleblowing:

We are committed to ensuring we operate with the highest standards of openness, probity and accountability.

In line with this ongoing commitment, we operate a Whistleblowing Policy to cover the genuine concerns our employees may have about suspected wrongdoing within the organisation. We encourage our people to be informed and understand their rights and protections in raising concerns about how colleagues are being treated or practices within our business or supply chain. The Policy guarantees employees the rights to raise any concerns, without fear of reprisal.

- Health and Safety:

CyberSmart's policy sets out our approach to ensure we provide a safe and healthy working environment for our staff and any contractors who work from any premises that the business has control over.

5. Due diligence

CyberSmart's supply chains are based throughout the world and include suppliers of direct materials (i.e. physical IT hardware and software to conduct business), suppliers of indirect services (i.e. professional services and facilities management for our offices) and distributors of our products. CyberSmart conducts due diligence on all suppliers prior to permitting those businesses to contract for services. This due diligence can include assessing regulatory licences and certificates, compliance with regulatory bodies, checks to determine the financial stability of the supplier.

As we grow the business we are committed to enhancing our supply chain due diligence with further steps as appropriate to a business of our size and reach into the market. We will seek to take positive action to encourage other businesses of a similar size to our own to adopt a public statement of commitment and compliance, even though they are not required to do so under the law as it stands.

We will provide periodic training to all employees to maintain awareness of and support understanding of the potential impacts of modern slavery and human trafficking on individuals, families and communities and where appropriate will include a reference to the Modern Slavery Act 2015 in our policies and procedures.

This statement was approved by our CEO and Founder, who will review and update it annually or otherwise as appropriate.

Jamie Akhtar

CEO and Founder
25 September 2023