



MODERN SLAVERY POLICY

1. PURPOSE

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes many forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2. Smartzi takes a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business dealings and relationships. The purpose of this Policy is to implement and enforce effective systems and controls to ensure modern slavery does not exist anywhere in our business or in any of our supply chains.
- 1.3. Smartzi is committed to ensuring transparency in our own operations and throughout our supply chains, in accordance with our disclosure obligations under the Modern Slavery Act. We will continue to include specific prohibitions against the use of forced, compulsory, or trafficked labour in our contracting processes, and we expect our suppliers and partners to hold their own suppliers to the same high standards.

2. OUR COMMITMENT

- 2.1. Smartzi is dedicated to operating ethically and ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. Our commitment is as follows:
 - 2.1.1. We will ensure compliance with local and national laws in all areas where we operate;

- 2.1.2. We will ensure the following freedoms exist for our workers: freedom to terminate employment, freedom of movement and freedom of association;
- 2.1.3. We will not tolerate: threats of violence, harassment, intimidation, use of worker-paid recruitment fees, compulsory overtime, child labour, discrimination or confiscation of workers' identification documents; nor will we restrict or attempt to restrict access to justice or compensation for workers.
- 2.1.4. We will conduct due diligence on suppliers and partners against the commitments above;
- 2.1.5. We will provide training and awareness on modern slavery to relevant staff and stakeholders.
- 2.1.6. We will Encourage reporting of concerns regarding modern slavery and provide protection for whistleblowers.

3. IDENTIFYING AND MITIGATING RISKS

- 3.1. The Company recognises the risks of modern slavery in our industry, as in many others. To mitigate these risks Smartzi commits to undertake a Review of our business, operations and supply chain which will be updated annually. The purpose of the Review is to undertake an assessment of the risk of Modern Slavery occurring anywhere in our supply chain and in particular to:
 - 3.1.1. Be satisfied that all drivers operate under fair and lawful conditions.
 - 3.1.2. Be satisfied that all other suppliers are in compliance with relevant Modern Slavery policies.
 - 3.1.3. To identify any high-risk suppliers and partners and ensure that they are subject to a Modern Slavery audit, are trained where necessary on relevant Modern Slavery Policies and that they are required to adhere to our Modern Slavery policies as a contract condition

- 3.2. All individuals to whom this policy applies is responsible for being aware of the risks of Modern Slavery in our supply chain, for being vigilant for any indications of risk and for reporting any concerns in accordance with this policy.

4. WHO IS GOVERNED BY THIS POLICY?

- 4.1. This policy applies to all individuals who work for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.
- 4.2. This policy is not part of any employee's employment contract, and we reserve the right to change it at any time.

5. RESPONSIBILITIES

- 5.1. The Directors of Smartzi Limited are ultimately responsible for ensuring that this policy conforms with our legal and ethical commitments, as well as that all people under our control abide by it.
- 5.2. George Brenan is the Director in charge of implementing this policy, monitoring its usage and effectiveness, dealing with any questions about it, and reviewing internal control systems and processes to ensure they are successful in combating modern slavery.
- 5.3. Management and team leaders at all levels are responsible for ensuring that people reporting to them understand and comply with this policy, as well as that they get proper and ongoing training on it and the subject of modern slavery in supply chains.
- 5.4. Any employee is welcome to comment on this policy and offer ways to improve it. Any comments, suggestions or queries are encouraged and should be addressed to George Brenan (george.brenan@smartzi.com).

6. POLICY COMPLIANCE

- 6.1. If you are a person to whom this Policy applies, you must read, understand, and enforce this policy. The prevention, identification, and reporting of modern slavery in any element of our company or supply chains is the duty of everyone who works for us or is under our authority.
- 6.2. You must refrain from engaging in any action that might be or might lead to a violation of this policy.
- 6.3. If you feel or suspect that a situation or action in conflict with this policy has occurred or will occur in the future, you must contact your line manager or a business director as soon as possible.
- 6.4. You are urged to express concerns about any issue or suspicion of modern slavery in any aspect of our business or any supplier tier's supply chain as soon as possible.
- 6.5. If you feel or suspect a violation of this policy has occurred or may occur, you must alert your line manager or a Director of Smartzi as soon as possible, or report it in accordance with our Whistleblowing Policy.
- 6.6. Where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 6.7. If you have any doubts about whether a specific act, the treatment of employees in general, or their working circumstances inside any tier of our supply chains represents any of the numerous types of modern slavery, please contact your line manager or a company Director.
- 6.8. We will assist anybody who expresses serious concerns in good faith under this policy, even if those concerns turn out to be incorrect. We are dedicated to ensuring that no one experiences any adverse treatment as a result of reporting in good faith their concern that modern slavery in any form is or may be occurring in any section of our own business or in any of our supplier networks.

6.9. If you suspect you have been subjected to such treatment, you should immediately notify your line manager. If the problem is not resolved, and you are an employee, you should file a formal complaint.

7. COMMUNICATION AND AWARENESS

7.1. Training on this policy, as well as the threat our company faces from modern slavery in its supply chains, is part of the induction process for all new employees, and updates will be offered through established channels of communication between the company and you.

7.2. Our zero-tolerance stance to modern slavery must be conveyed to all suppliers, contractors, and business partners from the beginning of our commercial engagement with them and reinforced as needed subsequently.

8. BREACHES OF THIS POLICY

8.1. Any employee who violates this policy may face disciplinary action, which might result in dismissal for misconduct. If other persons or organisations working on our behalf violate this policy, we reserve the right to terminate our relationship with them with immediate effect.

Approved by the Directors of Smartzi Limited.

March 2025



Chaenthen Balasundaram

Founder & CEO



George Brenan

Founder & CFO