

Modern Slavery statement.

SPARTA GLOBAL LIMITED STATEMENT AGAINST MODERN SLAVERY

Our Policy.

At Sparta Global we believe in the importance of equality in the workplace. Being a responsible corporate citizen is not only the right thing to do, it is good for the long-term viability of our business. We are committed to preventing acts of modern slavery and human trafficking from occurring within our business and the supply chain. We believe employment should be chosen. There must be no forced, bonded or involuntary prison labour. Supplier employees must not be required to lodge monies or identity papers in order to work and must be free to leave employment after the giving of reasonable notice.

Our Operations and People Director provides constant support to all members of staff and ensures all employees and Trainees are getting the relevant training and development needed in order for them to achieve all they can here at Sparta Global. We pride ourselves highly on promoting human rights within the business and ensure all members of staff are happy and content within their working environment. We encourage weekly catch ups and constant suggestions via our company portal on how we can strengthen the ways in which we protect our employees' rights and company benefits.

We hold our suppliers, business partners and all other stakeholders to the same standards that we hold ourselves. We run a safe and ethical business that extends well beyond Sparta Global. Our code of conduct is an overview of the guiding principles and values which govern how we make ethical decisions in conducting our business.

Please see below the following steps we have taken and continue to take in adherence to the Modern Slavery Act.

Supply Chain.

Our supply chain is not very complex however we work with a vast range of suppliers that provide services across a number of varied categories that range from cyber security, IT, telecoms, technology sales, data analytics and other services which can be seen on our company website. We keep very respectable relationships with our suppliers which allows us to have a good understanding and visibility of our supply chain.

Due to the strong relationships we have with our suppliers and contractors and Spartans we consider the risk of exploitation, human trafficking and breach of human rights very low. Nonetheless we are committed to ensuring such occurrences do not take place within our business or supply chain due to our procedures and due diligence.

Contracts

Our contracts include a provision for all suppliers to warrant that it has not and will not engage in any activity, practice or conduct which would constitute an offence under the Modern Slavery Act 2015.

Policies

All Sparta Global employees have access to channels in which they can communicate concerns, via local reporting mechanisms or internal whistleblowing procedures, which encourage all staff to report any wrong behaviour or breaches of our policies. Sparta Global are committed to protecting its employees when disclosing malpractice and we take this very seriously. All employees must be provided with a clear contract of employment which complies with local legislation. All contracts are received before employees join Sparta Global which gives new employees the opportunity to read through all of our company policies and raise any queries prior to starting, which encourages a smooth onboarding process for all parties.

Sparta Global hold a zero-tolerance policy on Modern Slavery and are committed to the highest level of ethical standards. All employees are under duty to comply and understand this policy. The prevention, detection and reporting of modern slavery and human trafficking within businesses or any supply chains is the responsibility of those working for Sparta Global. Employees are encouraged to avoid any behaviour that would suggest a clear breach of this policy.

Verification and Risk Assessment

Sparta Global require a due diligence process of supply chain risk based on international indices, supplier performance and other indicators of suppliers and contractors and have a supporting audit process. Our standard supplier contracts contain Compliance with Laws provisions which oblige the parties to comply with all laws applicable to their activities under the contract.

Audits

Verification of code conformance and assurance through our own supplier audit process including demonstration from our supply chain that they have passed down Sparta Global' requirements to their own suppliers and contractors and have supporting audit process.

Training

Sparta Global ensure that any updates of changes to our code of conduct in relation to modern slavery and human trafficking are fed to all employees and all necessary and/or recommended training takes place. All employees within any Sparta Global group subsidiary are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty.

This document has been authored by Purnima Sen, Board Member and Sparta's Operations and People Director.

