

20 June 2025

Modern Slavery Policy

SiXworks, an IBM Company, is committed to driving out acts of modern-day slavery and human trafficking within its business and from within its supply chains, including sub-contractors, and partners.

The Company acknowledges its responsibility within the Modern Slavery Act 2015 through publication of a policy statement setting out the steps we take to prevent modern slavery and related abuses.

Introduction

This statement sets out SiXworks' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2025.

As part of the IT industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Company structure and supply chains

This statement covers the activities of SiXworks:

SiXworks provides professional engineering services to UK Government, specialising in highly assured and classified systems. Our workforce predominately hold MOD vetting.

Countries of operation and supply

The Company currently operates in the United Kingdom only.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- The Company will ask all business partners and supplier for evidence of their Modern Slavery policies and adherence.
- Onboarding confirms Right to Work and Nationality as part of basic security vetting.

SiXworks do not currently undertake any activities which are considered to be at high risk of slavery or human trafficking.

Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- Policies: CEO.
- Risk assessments: CSO.
- Due diligence: Procurement, Vetting and Recruiting.
- Training: Director Delivery.

Relevant policies

The Company operates the following policies that support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Whistleblowing policy: the Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- Employee code of conduct: the Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- Supplier business agreement: the Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.

- Recruitment policy: the Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- Flowing adherence to Modern Slavery Act 2015 down to suppliers and contractors;
- Evaluating the modern slavery and human trafficking risks of each new supplier;

Performance indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- Requiring staff working in supply chain /HR to have completed training on modern slavery;
- Flowing adherence to Modern Slavery Act 2015 down to suppliers and contractors;

Training

The Company requires staff with relevant responsibilities to complete training on modern slavery.

The Company's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company;
- what external help is available, for example through the Modern Slavery Helpline, Gang masters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

Awareness-raising programme

As well as training key staff, the Company has raised awareness of modern slavery issues by putting up posters across the Company's premises.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Company.

Board approval

This statement has been approved by the Company's board of directors, who will review and update it annually.