

# Bytes Technology Group Plc

## MODERN SLAVERY AND HUMAN TRAFFICKING

### POLICY STATEMENT

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*The Modern Slavery Act 2015 (“the Act”) requires businesses to publish a transparency statement which sets out the steps they have taken to ensure there are no instances of modern slavery in their own business or in their supply chains.*

*This statement is made pursuant of the Act. Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which include the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.*

Bytes Technology Group Plc, through its primary subsidiaries, Bytes Software Services Limited and Phoenix Software Limited (collectively, ‘BTG’ or ‘the Group’) has a zero-tolerance approach to modern slavery in its constituent parts within the business and supply chains. BTG therefore is committed to taking appropriate steps to ensure that everyone that works for the Group in any capacity, benefits from a working environment in which their fundamental rights and freedoms are respected.

#### Supply chain

BTG is committed to acting ethically and with integrity in all our business dealings and relationships, while implementing and enforcing controls to ensure that modern slavery is not taking place anywhere within the business or within our supply chains.

We expect the same high standards from all our suppliers. As part of our contracting processes, we seek confirmation from our suppliers of their compliance to the Act to include specific prohibitions against modern slavery and we expect that our suppliers will hold their own suppliers to the same high standards.

An employee or supplier must report any incidence or suspicion of modern slavery at the earliest possible stage to executive management, operations management or a senior administrator. BTG may terminate its relationship with a supplier if it is in breach of this policy or where appropriate, may elect to work with the supplier to resolve the issue.

The software business sector is not considered one most at risk in relation to the Act and BTG does not have intricate supply chains, multiple levels of contracting and subcontracting, or partners with businesses based in impoverished regions of the world where labour laws are more likely to be non-existent and/or not legally enforced. However, policies are in place to guard against such practices in our supply chains; all contracts with business

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#### Board members:

**PJM De Smedt** | Chair  
**NR Murphy** | Chief Executive Officer  
**AJ Holden** | Chief Financial Officer  
**DN Maw**  
**MS Phillips**  
**E Schraner**  
**A Vincent**  
**WK Groenewald** | Group Company Secretary

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partners require prior approval in line with our delegation of authority frameworks; and business partners may be subject to various forms of vetting, including the verification of information provided to the Group. Selective due diligence exercises are performed, depending on the significance of the business partner to the continuity of the Group's business.

### Employment

BTG treats its employees in a fair, lawful and professional manner and provide supportive working conditions, including health and safety provisions, holiday entitlements, employee wellness programs and other benefits.

Recruitment processes are in place to ensure that employment laws are met, including "right to work" document checks which are carried out, verifications to ensure everyone employed are older than 16 years of age and that contracts of employment are issued.

The Group requires all employees to act in an ethical manner and to comply with legal requirements at all times by placing our values into practice. There is a confidential whistleblowing policy and process in place for any employee to raise concerns relating to the behaviour of suppliers, customers, partners or employees. Modern slavery training is available to all Group employees.

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On behalf of the BTG Board.

Signed:



**Neil Murphy**  
Chief Executive Officer

Dated: 7 April 2022