

## **Modern Slavery and Procurement Policy**

### **Introduction**

QuickSMS is committed to ensuring that its procurement processes align with the highest ethical standards and comply with modern slavery, human rights, and procurement laws. This comprehensive policy outlines QuickSMS.com's commitment to preventing modern slavery and forced labour while adhering to procurement laws across the UK, Europe, USA, and UAE. The policy applies to all business operations, including interactions with suppliers, contractors, and partners.

### **Legislative Framework**

QuickSMS operates within a complex legal framework that governs modern slavery and procurement practices. The following key legislative requirements guide our operations:

#### **1. UK Legislation**

- Modern Slavery Act 2015: Mandates businesses to produce an annual statement on the steps taken to ensure modern slavery is not present in their business or supply chain.
- Public Contracts Regulations 2015: Sets out the rules for public procurement, ensuring fair competition and compliance with environmental, social, and labour laws.
- Equality Act 2010: Prohibits discrimination and ensures ethical treatment throughout procurement and employment processes.

#### **2. European Legislation**

- EU Charter of Fundamental Rights: Enshrines fundamental rights, including the prohibition of slavery, forced labour, and human trafficking.
- EU Directive 2014/24/EU on Public Procurement: Establishes procurement rules to ensure fair treatment, transparency, and non-discrimination in the selection of suppliers and contractors.
- EU Directive 2011/36/EU on Preventing and Combating Trafficking in Human Beings: Sets out measures for preventing human trafficking and protecting victims, relevant to procurement through risk assessment and supplier verification.

#### **3. USA Legislation**

- Trafficking Victims Protection Act (TVPA): Prohibits all forms of human trafficking and mandates that businesses address human trafficking risks.
- Federal Acquisition Regulation (FAR): Outlines procurement policies that include anti-trafficking provisions requiring contractors and subcontractors to maintain compliance with ethical labour standards.
- California Transparency in Supply Chains Act: Requires large companies doing business in California to disclose efforts to eradicate slavery and human trafficking from their supply chains.

#### **4. UAE Legislation**

- Federal Law No. 51 of 2006 on Combating Human Trafficking: Criminalizes all forms of human trafficking, with penalties for violators.
- Federal Law No. 10 of 2017 on Domestic Workers: Protects the rights of domestic workers and outlines ethical labour practices.
- UAE Procurement Law: Ensures that all government and private procurement adheres to national labour laws and ethical standards.

## **Policy Commitments**

QuickSMS is dedicated to the following principles to ensure compliance with the above laws:

### **1. Compliance with Procurement Laws**

- Ensure all procurement activities comply with the relevant procurement and labour laws of the UK, Europe, USA, and UAE.
- Maintain transparency, fairness, and ethical standards in supplier selection, contracting, and operations.

### **2. Supplier Code of Conduct**

- Develop and enforce a Supplier Code of Conduct that requires compliance with anti-modern slavery and procurement laws.
- Mandate suppliers to provide evidence of compliance, including certifications, policies, and annual reports.

### **3. Risk Assessment and Due Diligence**

- Conduct thorough risk assessments to identify and address modern slavery risks within the supply chain.
- Implement due diligence processes for evaluating new and existing suppliers, including audits and compliance checks.

### **4. Contractual Requirements**

- Include specific clauses in all procurement contracts that require suppliers and subcontractors to comply with modern slavery and procurement regulations.
- Require suppliers to submit annual declarations of adherence to modern slavery laws and procurement standards.

### **5. Procurement Training**

- Provide regular training to procurement and supply chain teams on relevant laws and best practices related to modern slavery and ethical procurement.
- Ensure employees understand and are equipped to uphold ethical procurement standards and identify risks.

### **6. Supplier Engagement and Monitoring**

- Engage suppliers through workshops and training to promote awareness of modern slavery laws and ethical practices.
- Regularly audit suppliers to verify compliance with procurement and anti-slavery commitments.

### **7. Reporting and Transparency**

- Publish an annual statement detailing the steps QuickSMS has taken to prevent modern slavery and ensure compliance with procurement laws.
- Maintain transparent reporting channels for employees, suppliers, and partners to report any suspected violations of modern slavery or unethical procurement practices.

## **Implementation Measures**

### **1. Pre-engagement Due Diligence:**

- Conduct due diligence on all suppliers before engagement to verify compliance with modern slavery and procurement regulations.

### **2. Continuous Monitoring and Audits:**

- Implement ongoing supplier audits to ensure continued adherence to procurement laws and ethical standards.

### **3. Supply Chain Mapping:**

- Map the supply chain to identify high-risk areas and prioritize monitoring efforts.

### **4. Mandatory Compliance Declarations:**

- Require suppliers to submit compliance declarations and certifications aligned with UK, EU, USA, and UAE laws.

## **Scope of Policy**

This policy applies to all employees, contractors, suppliers, agents, and partners involved in any aspect of Quick SMS's procurement activities.

## **Reporting Mechanisms**

QuickSMS provides confidential channels for reporting any concerns related to modern slavery or procurement violations. Reports can be made without fear of retaliation, and all concerns will be investigated promptly.

## **Review and Accountability**

This policy will be reviewed annually by the Compliance Officer and updated as necessary to ensure continued alignment with changes in legislation and best practices. Any significant updates will be communicated across the organization and to relevant stakeholders.

## **Conclusion**

QuickSMS is committed to conducting business ethically and ensuring that modern slavery and unethical procurement practices have no place in its operations or supply chain. This policy underscores our dedication to transparency, compliance, and continuous improvement in our commitment to human rights and ethical business practices.