Modern Slavery, ESG and Ethical Business Statement

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About SimIntel

SimIntel Ltd is a UK IT and solution services company, registered in England and Wales (company no. 17472467). We design, build and support cloud, data and AI solutions for our clients, working remotely from home offices and occasionally on client sites. Our directors are personally accountable for everything in this statement.

This statement explains how we approach modern slavery, environmental, social and governance (ESG) matters, and ethical conduct. It forms part of our Integrated Management System, which we run to the requirements of ISO 9001 (Quality) and ISO/IEC 27001 (Information Security).

Modern Slavery and Human Trafficking

We do not tolerate slavery, servitude, forced or compulsory labour, or human trafficking in our business or our supply chain.

Our supply chain

We buy a small number of goods and services, mainly:

- Cloud platforms and software services (Microsoft, GitHub, Databricks and Anthropic, among others)
- Professional services (accounting, legal, insurance)
- Specialist subcontractors who may work on client engagements
- Laptops and other IT equipment

We consider the risk of modern slavery in our direct supply chain to be **low**. Our main suppliers are large, regulated organisations, and our subcontract agreement requires subcontractors to comply with the Modern Slavery Act 2015 and to confirm their people have the right to work in the UK.

Environmental

As a remote first, cloud native business with no data centres or company owned network infrastructure, our direct environmental footprint is small. The main sources are electricity for home and office working, IT equipment, cloud computing and occasional travel.

- **Cloud first:** Our services run on Microsoft Azure and Microsoft 365, which share infrastructure at scale and are covered by Microsoft's published carbon reduction commitments. We monitor Azure resource use and decommission client environments when engagements end.
- **Equipment:** We keep devices in use for as long as they remain secure and supported. At end of life, equipment is securely wiped under our Disposal and Destruction Policy before it is reused or recycled.

- **Travel:** We work remotely by default and travel to client sites only when it adds value, using public transport where practical.
- **Paper:** We work digitally, printing is the exception.

Social

- **Our people:** We support flexible and remote working, invest in training and professional development and treat everyone with dignity and respect. We do not tolerate discrimination, harassment or bullying.
- **Equality:** We choose and treat subcontractors and suppliers on merit, regardless of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
- **Health and safety:** We assess home workstations for safe setup and suitable equipment.
- **Data protection and privacy:** We protect personal data in line with UK GDPR and the Data Protection Act 2018, and we are registered with the Information Commission. Our Privacy Notice explains how we handle personal data.
- **Responsible AI:** We design and use AI tools under our AI Policy. Every AI tool is assessed for its impact on people and data before we use it and AI assisted work is reviewed by a person before it is delivered.

Governance and Ethical Business

Our commitments

- **Anti-bribery and corruption:** We do not offer, pay, request or accept bribes or facilitation payments, in line with the Bribery Act 2010, and our subcontract agreement requires the same of our subcontractors.
- **Fraud and tax evasion:** We do not tolerate fraud or the facilitation of tax evasion.
- **Conflicts of interest:** We declare any personal or commercial interest that could affect our advice to a client and we recommend technology and suppliers on their merits.
- **Fair competition:** We compete honestly and comply with competition law.
- **Confidentiality and Information security:** We protect our clients' information under our ISO/IEC 27001-aligned information security management system.
- **Honest marketing:** We describe our capabilities, accreditations and experience accurately.