SHARPSMART

Modern Slavery Policy



Sharpsmart
MAKING HEALTHCARE SAFER

1. Introduction

The Modern Slavery Policy outlines the steps Sharpsmart UK Ltd ('The Company') undertakes to understand potential modern slavery risks related to our business, and to put in place controls to ensure there is no slavery or human trafficking within the organisation (or its supply chain).

This Policy has been published in accordance with Modern Slavery Act 2015, Section 54 and relates to the Companies activities during the financial year July 1st, 2025 - June 30th, 2026. The policy is reviewed annually in accordance with Modern Slavery Act 2015, Section 54.

2. Definition

The Company defines modern slavery as practices that involve severe exploitation of individuals for personal or commercial gain. These acts encompass:

- **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of individuals through coercion, deception, abduction, or force, for the purpose of exploitation, including sexual exploitation, forced labour, or domestic servitude.
- **Forced Labour:** Work or service that individuals are compelled to perform against their will under the threat of punishment, violence, or coercion, with no ability to freely leave or refuse.
- **Slavery:** A condition in which a person is owned or controlled by another, where powers of ownership are exercised, resulting in the individual being treated as property and deprived of their freedom.
- **Servitude:** A severe form of exploitation in which an individual is forced to provide services under coercion, with the perception or reality that they are unable to escape the situation.
- **Dehumanisation:** Treating individuals as commodities, buying, selling, or exploiting them as if they are property, stripping them of their dignity and basic human rights.
- **Restriction of Freedom:** The physical confinement of individuals or the imposition of restrictions on their freedom of movement, preventing them from leaving or seeking assistance.

3. Organisation Structure

The Company is a leading company in the environmental and waste management industry, we are part of Daniels Health who, alongside offering our services in the UK operate in Canada, Australia and United States of America employing more than 1,000 people worldwide and operating in multiple facilities across the globe.

The Company sits under the global board of directors with UK based senior management and is organised into two divisions; Sharps Processing (Reusable Sharps Containers) & Waste Processing (Clinical and Total Waste).

We provide a range of waste management services, including sharps processing (reusable sharps containers), clinical waste processing and treatment and Total Waste Management services (TWM).

4. Additional Policies

The Company has the following policies which further define its stance on modern slavery ensuring we are conducting business in an ethical and transparent manner. These include:

- **Open Door and Whistleblowing Policy:** Communication is critical to the Company's success and to building good working relationships among our employees. All employees are encouraged to communicate ideas, suggestions, problems and issues of concern to the appropriate person(s). This policy is compliant with the Public Interest and Disclosure Act 1998 is consistent with its objective of providing a high-quality service, and that use of an agreed procedure will support that compliance.

- **Dignity at Work - Equal Opportunities & Harassment Policy:** The Company is an equal opportunities employer committed to providing a working environment free from discrimination which employees are able to realise their full potential and to contribute to its business success. This extends to our customers and suppliers. It is the responsibility of every employee to ensure their own conduct conforms to the expected standards and to flag issues should they discover behaviour that causes concern.

- **Company Handbook:** Serves as a comprehensive guide for employees, addressing key workplace matters including modern slavery, harassment, workplace violence, working hours, and overtime. It reinforces Sharpsmart UK's zero-tolerance stance on exploitative practices and its commitment to fostering a respectful and safe working environment. Employees are required to adhere to these standards as part of their employment.

- **Ethical Business Policy:** This policy outlines our core values, created to safeguard people, property and assets, wherever we provide our products and services. The Policy covers standards of business practice, approach to corporate governance, our commitment to employees and our approach to being a good corporate citizen.

5. Modern Slavery Approach

The company is dedicated to ensuring our operations and supply chains are free from modern slavery and human trafficking. We hold ourselves and our partners to the highest ethical standards, actively working to prevent any association with these practices. The measures the business takes include the following:

5.1. Promoting Awareness and Understanding Modern Slavery

The Company ensures that all employees receive training on modern slavery as part of their induction. This high-level onboarding provides essential knowledge to help identify, prevent, and address modern slavery risks within our operations. By integrating this training into the induction process for all staff, we promote a strong, organization-wide awareness of modern slavery issues, reinforcing our commitment to ethical practices and compliance with modern slavery legislation.

5.2. Supply Chain Assessment

We recognize the critical role that supply chain management plays in mitigating modern slavery risks, and we are committed to operating in full alignment with the Modern Slavery Act 2015. We expect our suppliers to share this commitment, ensuring that these principles are upheld throughout their supply chains. To support this, we conduct thorough due diligence when onboarding new suppliers and regularly review the practices of our existing suppliers.

The key measures taken in supplier selection and ongoing management are:

- **Supplier Questionnaire:** All potential suppliers complete an initial questionnaire to assess their practices in managing modern slavery risks, providing a foundation for evaluating their ethical commitments.

- **Risk Categorization:** Suppliers are assigned a risk rating based on factors such as geographical location, government actions, and the nature of the products or services provided.

- **Risk-Based Actions:** Suppliers are categorized as Low, Medium, or High Risk, with further actions—ranging from routine monitoring to corrective measures—depending on their risk level.

- **Ongoing Monitoring:** Supplier risks are regularly reassessed, ensuring continued alignment with modern slavery standards and proactive risk management.

- **Remediation & Corrective Actions:** In the event that modern slavery risks or incidents are identified in our supply chain, the Company will take immediate corrective actions. These may include working with the supplier to develop a corrective action plan, conducting additional audits, or, if required, terminating the business relationship.

- **Training for Supply Chain Personnel:** All Sharpsmart UK employees, involved in procurement and supply chain management, receive mandatory training on modern slavery. This training equips them with the knowledge to identify potential risks, using the supplier assessment tool and the steps to take to address concerns. The training is reinforced through regular updates and assessments to ensure ongoing compliance and awareness.

By adhering to this framework, the Company ensures that all suppliers meet our ethical standards and contribute to the global fight against modern slavery, both within our organization and throughout our supply chain.

6. Effectiveness of Measures

The Company continuously monitors the effectiveness of the measures we take to prevent modern slavery within our operations and supply chain. We track progress through several key performance indicators (KPIs), ensuring that our actions are impactful and consistently improving. These include:

- **Communication and Engagement:** We maintain ongoing communication with our supply chain representatives to ensure they understand and comply with our ethical standards. We monitor the level of engagement and understanding to assess how effectively our expectations are being met.

- **Employee Training:** All employees complete mandatory induction training on modern slavery. For supply chain personnel, we provide specialized training to help them assess and mitigate modern slavery risks. We track training completion rates and regularly evaluate the understanding and practical application of modern slavery risk management practices to measure progress.

- **Supplier Assessments:** All suppliers are required to complete comprehensive supply chain questionnaires. We review the completion rates, the quality of responses, and monitor for any reports or concerns related to modern slavery. We also track the corrective actions taken when issues are identified, using this data to assess the effectiveness of our due diligence processes.

By regularly monitoring these KPIs—engagement, training completion, and supplier compliance—we measure the effectiveness of our actions and continuously strengthen our approach to mitigating modern slavery risks across our operations and supply chain.

7. Policy Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Sharpsmart UK Ltd modern slavery and human trafficking statement for the financial year ending 30th June 2026.



DAN DANIELS | CEO

Revision Log

Date	Description of Change	Author Name	Approved by	Next Revision	Version No.
25/11/24	Initial Release	Evan Niteros	Jude Duff Dean McPhee	25/11/25	1
11/11/26	Policy review and dates updates.	Gemma Norton	Catie Taylor Gemma Ridley	11/11/27	2