

Modern Slavery Statement 2026

This Modern Slavery Statement is published in accordance with Section 54 of the Modern Slavery Act 2015 and outlines the actions taken by Swift Strategies Limited during the financial year 1 January – 31 December 2025 to prevent modern slavery and human trafficking within our operations and supply chains.

Swift Strategies is committed to ethical conduct, transparency, and continuous improvement in safeguarding human rights.

About Our Organisation

Swift Strategies is a specialist consultancy delivering Technology, Service and Application Transformation across the United Kingdom and the European Union.

Our Operating Model

- Directly employed consultants and delivery specialists
- A network of vetted associate consultants
- Procurement of professional services

Our Supply Chain Profile

- Predominantly UK-based suppliers
 - Low-risk sectors
 - Limited exposure to high-risk geographies
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Governance & Policies

Our Ethical Framework

Swift Strategies maintains a robust governance structure supported by the following policies:

- Individual Security Screening Policy
- Supplier Code of Conduct
- Whistleblowing Policy

Board Oversight

The **Board of Directors** holds ultimate responsibility for modern slavery compliance. Operational oversight is delegated to the CEO and the senior leadership team.

Risk Assessment

Our 2025 Risk Review

We conducted a structured assessment of:

- Sector-specific risks
- Geographic exposure
- Supplier categories
- Labour practices
- Contracting models

Key Findings

- Overall risk level: **Low**



- Potential risk areas:
 - Associate consultant engagements
 - Outsourced professional services

Risk Mitigation Measures

- Mandatory supplier due diligence
- Annual supplier re-assessment
- Contractual compliance clauses
- Verification of right-to-work documentation

Due Diligence Processes

Our due diligence framework includes:

- Supplier identity and ownership checks
- Review of supplier modern slavery statements
- Assessment of labour practices for employment agencies
- Requirement to sign or meet our Supplier Code of Conduct
- Ongoing monitoring through contract reviews and performance discussions

Where concerns arise, Swift Strategies investigates promptly and takes appropriate action, including suspension or termination of supplier relationships.

Training & Awareness

Building Internal Capability

We deliver targeted training to ensure our people understand modern slavery risks:

- **Leadership team:** training on risk identification and escalation
- **Procurement staff:** training on due diligence and supplier engagement
- **All employees:** annual awareness materials and reporting guidance

Training completion is monitored and reported to the Board.

Reporting & Stakeholder Engagement

Encouraging Responsible Reporting

Employees, contractors, and suppliers can raise concerns confidentially through our whistleblowing channels.

2025 Reporting Summary

- No concerns raised
- No investigations required
- No suppliers removed due to non-compliance

Measuring Effectiveness

We monitor progress using the following KPIs:

- Supplier due diligence completion rates
- Supplier Code of Conduct adoption
- Training completion rates
- Time spent on audits and spot checks



- Number of concerns raised and resolved

These KPIs are reviewed annually by the Board.

Continuous Improvement Priorities for 2026

Swift Strategies will:

- Enhance supplier segmentation and risk-tiering
- Introduce a structured annual supplier audit programme
- Expand training with real-world case studies

Approval

This statement was **approved by the Board of Directors** of Swift Strategies Limited on 21st January 2026.

Nathan Swift

Chief Executive Officer
Swift Strategies Limited

