

# **Modern Slavery and Ethical Conduct Statement**

Issued by: Sapat Mada Consulting (SMC)

Effective Date: 17 April 2025

Applicable Jurisdictions: International - United Kingdom, US, EU & India

### Introduction

At **Sapat Mada Consulting (SMC)**, we uphold the highest standards of ethical business conduct across our operations in the **United Kingdom, India**, and internationally. We recognise our responsibility to ensure that modern slavery, human trafficking, forced labour, and exploitative practices have no place within our organisation or supply chains.

This statement reflects our ongoing commitment to comply with the **UK Modern Slavery Act 2015**, and to actively promote fair labour practices across all jurisdictions we operate in, including **India**, where we are headquartered.

#### **Our Business Overview**

SMC is a strategic advisory and consulting firm delivering services in **management consulting**, **digital transformation**, **staffing solutions**, **application integration**, and **learning solutions**. Our cross-sector experience spans **healthcare**, **software**, **government**, **education**, **and recruitment**, with engagements in both the public and private sectors.

We work with global and domestic partners, and we are aware that in a diverse and extended supply ecosystem, there is potential risk of unethical labour practices — particularly in staffing, technology implementation, and third-party subcontracting.

#### **Our Commitment**

We are unwavering in our stand against any form of exploitation and modern slavery. Our commitments include:

- Zero tolerance for modern slavery, human trafficking or bonded labour.
- Transparent, ethical sourcing and partner relationships.



- Promoting awareness and prevention through training and active governance.
- Encouraging grievance redressal and whistleblowing in a safe environment.

#### **Our Frameworks and Actions**

SMC ensures that our practices reflect integrity and accountability:

#### 1. Governance & Ethics

- Adherence to the UK Modern Slavery Act 2015, and international human rights standards.
- Executive leadership oversight on ethical supply chain compliance and partner audits.

### 2. Supplier & Partner Due Diligence

- All vendors and affiliates are vetted for ethical standards before engagement.
- Inclusion of non-exploitation clauses in contracts and third-party agreements.

### 3. Indian Operations Focus

- Our domestic partners and service providers in India are made aware of our Code of Ethics and Labour Fairness Standards.
- We ensure our workforce policies align with Indian Labour Laws and ILO conventions.

#### 4. Internal Training & Awareness

- Awareness campaigns across teams regarding forced labour risks and reporting mechanisms.
- Training modules on ethical procurement and compliance integrated into onboarding and annual refreshers.

#### 5. Reporting and Remediation



- Accessible reporting tools for employees and third parties to raise concerns.
- Investigation and corrective action processes in case of any breach or unethical conduct.

## **Looking Ahead**

To strengthen our position further, we will:

- Expand annual audits for higher-risk partnerships.
- Reinforce training programmes in both UK and Indian teams.
- Align ourselves continuously with evolving UK and Indian ethical business guidelines.

## **Board Approval**

This statement is reviewed and approved by the leadership of **Sapat Mada Consulting** and applies to all regions of operation, including the **UK and India**.

### Signed:

Dilip Kumar Laha Managing Director Sapat Mada Consulting

**Date:** 17 April 2025