

Shift Left Modern Slavery Statement

1 Introduction

Shift Left is committed to supporting and respecting internationally proclaimed human rights. Shift Left's culture is shaped by our core values, which underpin all of business relationships:

- Positive
- Pro-active
- Professional
- Fair
- Ethical

Fair and ethical mean that we have complete respect for individuals, which means we cannot condone any aspect of modern slavery or human trafficking. Shift Left is committed to ensuring modern slavery is not present in its supply chains and has introduced and will continue to develop policy and procedures to manage the way it obtains goods and services to keep its supply chains robust and ethical.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Shift Left's slavery and human trafficking statement for the financial year ended 30th September 2022. This statement covers all the activities of Shift Left Group.

2 Legal Requirements

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations operating in the UK with an annual turnover in excess of £36m to produce a 'slavery and human trafficking statement for each financial year of the organisation'. There are two legal requirements:

1. Statements must be published on organisation's UK website with a link in a prominent place on the UK homepage. Please see the bottom of our homepage at www.shiftright.today for compliance to this requirement.
2. Statements should be approved by the board of directors and signed by a director. Please see section 8 for compliance to this requirement.

3 Shift Left Structure and Supply Chain

Shift Left is a quality focused business and technology consultancy, which operates globally, primarily in the UK and Northern Europe. Our consultants typically work from home or on-site at client facilities.

The nature of our business, which is based on providing business and technology services (and the fact that physical manufacturing is not a service that we provide) means that the risk of modern slavery and human trafficking within our supply chain is very low. Furthermore, the risk faced by Shift Left is further mitigated because our supply chains are limited in number and short, which means that we have clear visibility of the working practices of all our suppliers.

4 Policies Related to Modern Slavery

Shift Left has a compliance function which has responsibility for minimising the risk of modern slavery in our supply chain by upholding this policy and its related policies:

- Supplier Assessment Policy which sets out internal requirements for on-boarding new suppliers and services for security and business practices including their approach to addressing slavery and human trafficking.
- Whistleblowing Policy which encourages staff to report concerns including any related to modern slavery/trafficking and child or forced labour.

5 Due Diligence Process, Risk Assessment and Risk Management

All suppliers which we class as a potential risk must complete our Supplier Assessment, which covers their governance, policies, training and supply chain management processes.

The Shift Left governance team is responsible for assessing the information submitted by suppliers. Should a supplier fail to provide the information requested or to meet our expectations, we will take appropriate action, which may include not entering into a relationship or terminating the relationship with the supplier concerned.

Our suppliers will be required to:

- Respect Shift Left's values in relation to treating people fairly, with dignity and respect
- Ensure that they and each of their subcontractors comply with all applicable laws, statutes and regulations relating to the Act.
- Purchase resources, products or services only from organisations who do not use forced labour in their operations
- Sign a statement of compliance and to notify Shift Left should they become aware of any actual or suspected slavery or human trafficking occurring within their business or supply chain

The prevention, detection and reporting of modern slavery in all areas of our business is the responsibility of all those working for us, and we welcome their active participation. While our culture is such that we encourage staff to raise concerns openly, we also have a formal whistleblowing policy in place which is designed to make it easy for staff to make discrete disclosures through management. The details of the whistleblowing policy are shared as part of the onboarding process. We post all notices as required by country, province and state in our workplaces regarding policies which state the rights and acceptable treatment of our employees, as required by law.

The information given to agency staff and all contractors will include summary information on the Modern Slavery Act and detailed information on who to contact should they feel that their human rights are being (or at risk of being) infringed.

At present the risk associated with slavery and human trafficking has been assessed by the Group Board as being very low. This is monitored on a quarterly basis and any further actions or changes to this statement would be made as a result of a change to this risk assessment.

6 Action Taken to Address Modern Slavery

Awareness of the challenges associated with slavery and human trafficking has been increased through the use of training (see section 7), one on one coaching sessions and the publication and distribution of this statement.

7 Training

All senior members of the management team have been walked through this statement and through the guide recommended by the government website (https://corporatejusticecoalition.org/wp-content/uploads/2017/06/Core_RecommendedcontentFINAL-1.pdf).

All new employees read this statement and spend some with a director of the company to discuss the full ramifications of modern slavery and human trafficking.

8 Agreement

This policy has been agreed by the Shift Left board and is signed below.

Signed:

David Rigler

David Rigler

Managing Director

10th September 2021