

# Modern Slavery & Human Trafficking Policy Statement

## Strategic Data Consultancy Ltd

**Document Ref:** SDC-POL-MOD-001

**Version:** 1.0 – Initial Version

**Date:** 12 April 2026

**Review Date:** 11 April 2027

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### 1. Purpose

This policy sets out Strategic Data Consultancy Ltd's (SDC) commitment to preventing modern slavery and human trafficking in its business operations and supply chains.

This statement is made in accordance with the Modern Slavery Act 2015. Although SDC's turnover is below the £36 million threshold and there is no legal obligation to publish this statement, SDC recognises its responsibility to operate ethically and with integrity in all business relationships.

SDC does not tolerate any form of modern slavery, forced labour, or human trafficking.

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### 2. Scope

This policy applies to all activities undertaken by SDC, including its operations, supply chain, and relationships with clients, contractors, and suppliers.

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### 3. Our Business and Structure

SDC is a specialist consultancy providing:

- M&E asset verification
- Building services condition surveys
- Lifecycle and asset data analysis
- Support to facilities management providers and consultancy partners

The business operates with a lean structure, using a combination of direct delivery and specialist subcontract support, and does not have a complex group structure or overseas subsidiaries.

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### 4. Countries of Operation

SDC operates primarily in:

- United Kingdom
- European Union (including Switzerland and the Netherlands)

All work is undertaken within regulated environments and typically under the control of large organisations or principal contractors.

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## **5. Supply Chain**

SDC's supply chain is limited and consists primarily of:

- Specialist subcontractors (surveyors and engineers)
- Professional service providers
- Travel and accommodation providers

SDC does not engage in manufacturing, high-risk labour sectors, or complex multi-tier global supply chains.

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## **6. Risk Assessment**

Given the nature of SDC's operations, the risk of modern slavery within the business is considered low.

However, SDC recognises that risk may still exist within:

- Extended supply chains
  - Subcontractor arrangements
  - International operations
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## **7. Due Diligence**

To mitigate risk, SDC will:

- Work with reputable clients, contractors, and suppliers
  - Where reasonably practicable, ensure suppliers demonstrate appropriate ethical standards
  - Avoid engagement with organisations where there is known or suspected risk
  - Remain alert to indicators of modern slavery within its operations
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## **8. Internal Assurance**

SDC confirms that:

- No instances of modern slavery or human trafficking have been identified within its business
  - To the best of its knowledge, no such activities are taking place within its direct supply chain
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## **9. Responsibility**

Given the size and structure of the business, responsibility for this policy sits with:

John Sutherns – Director

This policy will be reviewed annually and updated where necessary.

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## **10. Reporting Concerns**

SDC encourages all employees, associates, and subcontractors to raise any concerns relating to modern slavery or human trafficking.


Any concerns raised will be taken seriously and investigated appropriately.

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## **11. Commitment**

SDC is committed to maintaining transparency and ethical standards in its operations and supply chain, and to supporting the wider objective of eliminating modern slavery.

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**Signed:**  
John Sutherns  
Director