



Secure Data Management Ltd.
(the “Company”)

Slavery & Human Trafficking Statement

INTRODUCTION FROM THE MANAGING DIRECTOR

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibly to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

ORGANISATION'S STRUCTURE

We are a provider of records management and offsite storage services. Secure Data Management Ltd. has a head office in London, UK and satellite storage facilities based in England. The Company provides services to businesses with turnovers in excess of £36m.

OUR BUSINESS

The Company is organised into four business units: Management, Sales, Operations / Customer Service and Finance.

OUR SUPPLY CHAINS

Our supply chains include the sourcing and installation of racking materials principally related to the secure storage of archive documents.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk –

- We vet all of our suppliers to ensure that they meet the relevant regulatory requirements within the UK and the local council;
- We limit the geographical scope of our storage premises to ensure optimum supervision of the use of our properties;
- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour;
- With regards to national or international supply chains, we deal exclusively with businesses based in the UK and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We have in place systems to encourage the reporting of concerns and the protection of

whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

The Management, Operations and Finance Directors are responsible for compliance in their respective departments and for their supplier relationships.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of facilities audits by our Business Managers;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

Marc Chauveau
Managing Director
Secure Data Management Ltd.