

Modern Slavery Policy

Policy statement

Two Hat Software Ltd has zero tolerance of modern slavery and human trafficking. This includes forced, bonded and compulsory labour, servitude and child labour. We are committed to acting ethically and with integrity in all our business dealings, and to making sure modern slavery is not taking place anywhere in our own business or in our supply chains.

We are not required to publish a slavery and human trafficking statement under section 54 of the Modern Slavery Act 2015, because our turnover is below the threshold. We have adopted this policy voluntarily, because our clients expect it of their suppliers and because it is the right thing to do.

Scope

This policy applies to the company's director, to any employees we may take on, and to any substitutes, subcontractors and suppliers who work with or for us.

Our business and supply chain

We are a small software development and technology consultancy based in England. Our work is carried out by skilled professionals, and the risk of modern slavery in our own operations is low.

Our main suppliers provide:

- cloud hosting and software services
- computer hardware
- professional services, such as accountancy

We recognise that the manufacture of electronic hardware carries a higher risk of forced labour in global supply chains.

What we do

- **Buying hardware.** We buy hardware from established manufacturers and retailers that publish their own modern slavery statements, and we prefer refurbished equipment where it is suitable.

- **Choosing service providers.** We use reputable providers that publish modern slavery statements or have equivalent commitments.
- **Engaging people.** Anyone we engage to work with us must have the right to work in the United Kingdom, or in the country where the work is done. They must be engaged on fair terms and paid on time.
- **Ending relationships.** We will end our relationship with any supplier or subcontractor where we find evidence of modern slavery and they do not take prompt action to deal with it.

Reporting concerns

Anyone who suspects modern slavery in connection with our business should report it to the director at admin@twohatsoftware.co.uk. Concerns can also be reported in confidence to the Modern Slavery and Exploitation Helpline on 08000 121 700. If someone is in immediate danger, call 999.

We will not tolerate anyone being treated unfairly because they raised a concern in good faith.

Awareness

The director keeps up to date with guidance on modern slavery risks. Anyone we engage will be made aware of this policy.

Responsibility and review

The director, George Dennington, is responsible for this policy and for making sure it is followed. It is reviewed at least once a year.

This policy took effect on 3 October 2026.

Two Hat Software Ltd is registered in England and Wales, company number 17490460.

Registered office: Apartment 6, 89 Parade, Leamington Spa, England, CV32 4NL.

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