

Modern Slavery and Human Trafficking Statement

Financial Year 2025/26

1. Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Smart Parking Limited (SPUK) during the financial year ending 30 June 2026 to identify, prevent and address the risks of modern slavery and human trafficking within our business and supply chains. Board approval for this statement was given on 23 October 2026.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to taking appropriate steps to prevent modern slavery and human trafficking within our operations and supply chains. This commitment is reflected in our internal Modern Slavery Policy which is readily available to all employees.

We recognise that modern slavery can occur within an organisation's own operations and at any stage of its supply chain. We therefore seek to understand the risks relevant to our business and to maintain appropriate measures to identify and manage those risks.

2. Our organisation, business and supply chains

Smart Parking Limited (SPUK) is a subsidiary of Smart Parking Limited which is publicly listed on the Australian Securities Exchange which is a global technology business. Our business provides integrated smart parking services internationally and operates tens of thousands of car park spaces using Automatic Number Plate Recognition and Licence Plate Recognition technology. These services are offered to various sectors including councils, hospitals, hospitality, places of worship, education and retail. SPUK goods and services are mainly sourced from suppliers based within the UK.

Our approach considers both direct and indirect suppliers and includes labour and material supply chains within and outside the UK. Supply-chain mapping may include gathering information about the organisations with which we do business and, where appropriate, their own suppliers.

We recognise that modern slavery risk is not confined to the direct provision of our core products or services and can arise in supporting functions and services throughout the supply chain.

3. Our policies on modern slavery and human trafficking

Our internal Modern Slavery Policy sets out our commitment to trading ethically, sourcing responsibly and working to prevent modern slavery and human trafficking throughout our organisation and supply chains.

The Policy applies to employees, workers, agency staff, self-employed contractors and volunteers. It explains modern slavery and human trafficking, the standards we expect within our organisation and the responsibilities individuals have in helping us to identify and prevent exploitation.

Our Modern Slavery Policy is supported by our Whistleblowing Policy and Grievance Policy. Individuals who believe or suspect that modern slavery or human trafficking may exist within our business or supply chains are expected to report their concerns in accordance with our Whistleblowing Policy. Anyone who is unsure whether something may constitute modern slavery is encouraged to raise the matter with the UK Finance Director or UK HR.

We support those who raise genuine concerns in good faith and do not tolerate detrimental treatment arising from the raising of such concerns.

4. Due diligence

We undertake due diligence designed to identify and assess modern slavery risks within our organisation and supply chains.

Employees involved in procurement are expected to consider modern slavery risk before approving suppliers. Factors considered include:

- whether a supplier trades in or operates in countries presenting an increased modern slavery risk;
- whether its activities are within sectors presenting an increased risk;
- the supplier's awareness of and approach to modern slavery;
- its willingness to provide information about its own supply chain;
- whether it monitors its own suppliers;
- whether appropriate whistleblowing arrangements are in place; and
- if known, whether staffing costs appear consistent with the nature and scale of the business.

Where responses indicate potential increased risk, further support should be sought from the UK Procurement Manager and/or the UK Finance Director before proceeding.

Where appropriate, we may also require suppliers to confirm that there is no slavery or human trafficking within their business or supply chains and may seek further information to improve our understanding of their supply arrangements.

Where a concern regarding a supplier is identified, employees are instructed not to make direct accusations or approaches themselves and instead to follow our established procedure for escalating concerns under the Whistleblowing Policy.

For the next financial year, we will continue to review, monitor and continuously improve our due diligence procedures.

5. Risk assessment and management

We understand that the risk of modern slavery can arise both within our own organisation and through our supply chain.

We recognise that responsible recruitment and employment practices are an important part of reducing the risk of labour exploitation and modern slavery within our own operations.

Recruitment is predominantly managed directly in-house. Recruitment agencies are used only where appropriate, primarily for specialist or niche roles. Where recruitment agencies are engaged, we expect them to operate in accordance with applicable employment legislation and appropriate ethical recruitment standards.

We are committed to ensuring that individuals choose freely to work for us and are not subject to coercion, forced labour or exploitative recruitment practices. Our employment practices include appropriate pre-employment checks and clear terms and conditions of employment.

We have controls in place to ensure that rates of pay are reviewed and that employees are paid at least the applicable statutory minimum rate. We also maintain HR processes through which employees can raise concerns, including our grievance and whistleblowing arrangements. Our Modern Slavery Policy identifies open appraisal arrangements and escalation of concerns to HR as mechanisms supporting this approach.

These employment and recruitment controls form part of our approach to managing the risk of modern slavery and labour exploitation within our own workforce.

Our Policy also recognises the supply chain as a key area of modern slavery risk. We seek to assess risk across our supply chain and consider factors including geographic location, sector and supplier practices when considering the level of risk presented by suppliers.

Where appropriate, our supply-chain mapping encompasses both direct and indirect suppliers and considers labour and material supply chains both within and outside the UK.

Where risks or concerns are identified, these are considered and escalated in accordance with our internal policies and procedures.

6. Measuring our effectiveness

We recognise the importance of reviewing the effectiveness of the measures we take and of continually developing our approach to preventing modern slavery.

For the financial year covered by this statement, we have considered the following indicators when reviewing the effectiveness of our approach:

- completion rates for mandatory Modern Slavery training; and
- the number of modern slavery concerns raised through internal reporting arrangements.

For the next financial year, we intend to extend this to include consideration of the following additional indicators:

- the number/proportion of relevant suppliers subject to modern slavery due diligence or risk assessment;
- the number of higher-risk suppliers identified and subject to further review; and
- progress in mapping relevant areas of our supply chain.

For future reporting periods, we will continue to review our controls and use the information available to us to identify opportunities to strengthen our approach.

7. Training and awareness

Modern slavery awareness forms part of our mandatory HR training.

All UK employees are required to complete a Modern Slavery e-learning module as part of their mandatory induction training and existing employees are required to complete this on a regular basis to ensure knowledge and awareness is maintained.

Our Modern Slavery Policy also explains the responsibilities of individuals working within the organisation, including how to recognise potential areas of risk and how concerns should be reported. Employees involved in procurement have additional responsibilities when considering suppliers and are required to consider specified modern slavery risk factors as part of supplier due diligence.

8. Reporting concerns and remediation

We take reports of suspected modern slavery seriously and will investigate concerns raised regarding our own business or supply chains.

Employees and others covered by our Modern Slavery Policy are expected to raise suspected breaches or concerns as soon as possible through the procedures set out in our Whistleblowing Policy. Individuals can also seek guidance from the UK Finance Director or HR, where they are uncertain whether circumstances may constitute modern slavery or human trafficking.

During the financial year ending 30 June 2026, there were no modern slavery concerns identified or reported.

9. Our priorities for the next financial year

We are committed to continually improving our approach to identifying and managing modern slavery risks.

During the next financial year, we intend to focus on:

- continuing employee awareness and mandatory training;
- further developing our understanding and mapping of relevant supply chains;
- maintaining appropriate modern slavery considerations within supplier due diligence;
- reviewing identified higher-risk areas and suppliers where appropriate; and
- developing and reviewing appropriate measures to assess the effectiveness of our approach.

Our priorities will be reviewed as our business activities, supply chains and understanding of modern slavery risks develop.

10. Approval

This statement has been prepared in accordance with section 54 of the Modern Slavery Act 2015 and constitutes Smart Parking Limited's Modern Slavery and Human Trafficking Statement for the financial year ending 2025/26.

This statement was approved by the Board of Directors on 23 October 2026.

Signed: 

Name: Johanna Hiney

Position: UK Managing Director

Date: 23 October 2026