

SPARK DATA SYSTEMS

Modern Slavery Statement

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps that Spark Data Systems has taken to ensure that slavery and human trafficking are not taking place in our business or supply chains.

Our Business

Spark Data Systems is a UK-based technology consultancy specialising in data systems, software development, and cloud infrastructure. Due to the nature of our services and supply chain, we assess the risk of modern slavery within our operations to be low.

Our Commitment

We are committed to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.

Policies and Governance

We operate a number of internal policies including Modern Slavery Policy, Whistleblowing, Anti-Bribery, Equality and Diversity, and Recruitment policies. Overall responsibility sits with the Directors, with day-to-day responsibility delegated to the Operations & Delivery Manager.

Recruitment and Employment Practices

We ensure all employees have the legal right to work in the UK, are protected from coercion and are paid through verified payroll processes into accounts in their own name.

Supply Chain and Due Diligence

We assess modern slavery risks during supplier onboarding and seek to work only with organisations that comply with the Modern Slavery Act 2015. We do not knowingly engage with organisations involved in slavery or forced labour.

Training and Awareness

Employees are expected to be aware of modern slavery risks and are encouraged to report concerns. Training is provided where appropriate.

Reporting Concerns

Employees may raise concerns via line management or through the Whistleblowing Policy. All concerns are investigated appropriately.

Ongoing Commitment

We will continue to review and improve our practices to ensure compliance with legislation and uphold ethical standards.

Approved by: Directors of Spark Data Systems

Date: June 2026



Signature: Richard S Lowe