

Modern Slavery and Human Trafficking Statement

Financial year ended 31 August 2026

1. Introduction and scope

Smart Group Ltd (the “Group”) is committed to respecting human rights and preventing modern slavery, forced labour and human trafficking in its operations and supply chains. This statement describes the steps taken during the financial year ended 31 August 2026 and areas identified for further improvement.

The Group operates businesses in hospitality, catering and event management. This statement is intended to cover Smart Group Ltd and the following subsidiaries:

- The Moving Venue Caterers Limited
- Battersea Evolution Limited
- Story Events Limited
- The Last Supper UK Limited

2. Our operations, workforce and supply chains

The Group works with suppliers across food and beverages, audiovisual production, event equipment and logistics, venues, staffing and other operational services. Its workforce includes permanent employees, casual event staff engaged directly and temporary workers supplied by external staffing agencies.

The Group recognises that some sectors and arrangements may carry heightened risks, including agricultural and imported food supply chains, labour supplied by third parties, cleaning and other outsourced services, and products sourced through complex international supply chains. Identifying these potential risks does not imply that an incident has been found.

3. Policies and standards

The Group maintains HR policies and a Whistleblowing Policy which apply across its businesses. Its existing governance framework also includes employee conduct, anti-discrimination, anti-bullying, anti-harassment, grievance, gifts and anti-bribery guidance.

The Group expects its suppliers and business partners to comply with applicable laws and uphold ethical employment practices, including the prevention of modern slavery, human trafficking, child labour and forced, bonded or compulsory labour.

The Group recognises that its supplier due diligence arrangements currently vary according to supplier type and is committed to developing a more consistent, risk-based approach to assessing labour and modern slavery risks within its supply chains.

Employees are encouraged to report known or suspected concerns through established management, HR and whistleblowing channels. The Group will review how these reporting arrangements can be strengthened, including their accessibility to agency workers and individuals within its supply chains.

4. Supplier due diligence and supply-chain visibility

Supplier onboarding and compliance requirements currently vary by supplier category. The existing processes do not amount to a consistent, formal modern slavery assessment across the Group's supply chain. The Group recognises the need to strengthen supplier mapping, risk screening and follow-up, particularly for labour providers and other potentially higher-risk categories.

5. Recruitment and labour arrangements

The Group engages casual event staff directly and also uses external staffing agencies. It recognises that temporary and agency labour can present risks involving recruitment fees, wage withholding, coercion and restrictions on workers' freedom.

The Group's HR and Whistleblowing Policies support its commitment to ethical employment and the protection of workers. For directly engaged casual workers, the Group undertakes the required right-to-work checks and applies its established recruitment and employment procedures.

The Group also maintains contractual arrangements with external labour providers, including staffing agencies, which address legal compliance, workers' eligibility to work in the UK and relevant employment responsibilities. Its agency Service Level Agreement additionally sets expectations concerning training, working time, pay and record-keeping, and provides for the inspection of supplier worker records.

The agency SLA is currently under review, alongside opportunities to strengthen and standardise modern slavery-specific due diligence and worker welfare safeguards across external labour arrangements.

6. Training and awareness

Modern slavery awareness training is provided to all permanent employees across the Group. The Group recognises the particular importance of awareness among employees involved in recruitment, procurement, supplier management and the supervision of agency or temporary workers.

Training is delivered through an online module specifically designed for the hospitality industry. Relevant employees complete the training as part of their onboarding, with refresher training provided through the Group's biennial training programme.

The most recent Group-wide refresher training took place in January 2025, with the next scheduled for January 2027. The Group will continue to review its training requirements to ensure employees remain aware of modern slavery risks, potential warning signs and the appropriate procedures for reporting concerns.

7. Monitoring and effectiveness

The Group recognises that its existing policies, recruitment procedures, contractual requirements for external labour providers and modern slavery awareness training provide important foundations for preventing and identifying modern slavery risks.

During the reporting period, no concerns or suspected incidents of modern slavery or human trafficking were reported through the Group's established reporting channels. The Group recognises that the absence of reported concerns does not necessarily mean that no risks or instances of exploitation exist.

While the Group undertakes employment eligibility checks for directly engaged casual workers and maintains contractual compliance requirements for external staffing providers, it recognises that a more consistent approach to modern slavery-specific supplier due diligence and the measurement of effectiveness is required.

The Group intends to strengthen its monitoring arrangements through the ongoing review of staffing agency and service company agreements, the development of proportionate, risk-based supplier assessments and continued review of staff training and reporting procedures.

8. Priorities for FY27

The Group intends to develop a proportionate, risk-based supplier assessment process, initially prioritising staffing agencies, food supply chains and outsourced services.

The Group also intends to review the consistency of labour-provider checks and to consider how it records training, monitors supplier compliance and reports progress to senior management. These are planned improvements, not claims that the measures were in place during 2025/26.

9. Approval and publication

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and relates to the financial year ended 31 August 2026.

It sets out the steps taken by Smart Group Ltd and its subsidiaries during the reporting period to prevent modern slavery and human trafficking within their business operations and supply chains.

This statement was approved by the Board of Directors of Smart Group Ltd on 15th October 2026.

Signed: 

Name: Elaine Sawford

Position: Director, Smart Group Ltd

Date: 15th October 2026