

Modern slavery statement

Due to our turnover, we are not required to have a published Modern Slavery Policy. However, we still have robust procedures in place to mitigate the risk of modern slavery. This includes a zero- tolerance approach to exploitative working practices. To ensure modern slavery is not taking place anywhere in our own business or with supply chain partners, we implement effective checks, systems and controls. Alongside an assessment of fair working practices, we have undertaken a supply chain assessment and mapping exercise to deduce modern slavery risks.

Facilitated through our open and safety-focused culture, and through training, we ensure that the prevention, detection and reporting of modern slavery is the responsibility of all employees. If employees are found to be in breach of this policy, then this could lead to disciplinary action in line with our disciplinary procedure.

As part of our procurement processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. This includes adults and children. We will also hold discussions with our suppliers during review meetings to ensure they hold their own suppliers to the same high standards. If a supplier does not comply with modern slavery laws, we would immediately remove the supplier from our supply chain.

Our Structure

Providing Director-level accountability, Stuart Cole, Commercial Director, is ultimately responsible for overseeing our Modern Slavery policy and eliminating risks throughout our organisation. Based in Cheshire, we specialise in delivering IT services to small and medium-sized businesses. We maintain stringent accreditations, including ISO9001, and work with accredited global technology partners. This includes Microsoft, Broadcom and Dell. We have vetted and confirmed that all our supply chain partners are compliant with the Modern Slavery Act and that there is 0 modern slavery within our supply chain.

Managing risks

The main risks of modern slavery are within our supply chain. We complete ongoing risk assessments throughout all parts of our business and supply chain to continually identify, mitigate and manage new or emerging threats. We manage risks through robust measures, including but not limited to:

- Conducting thorough due diligence on all suppliers and partners.
- Regularly auditing and monitoring our supply chains to ensure compliance with our ethical standards.
- Providing training and resources to our employees and suppliers to raise awareness about modern slavery and human trafficking.
- Ethically sourcing raw materials for production of IT hardware



- Ensuring supply chain is free from malicious tampering and counterfeit components
- Maintaining ethical labour practices within supply chain
- Adhering to relevant laws and regulations in all geographies where our suppliers operate and have a presence

Our policies and training

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. All staff are trained on these policies as part of induction and refreshed annually or sooner if there are updates/changes. Our policies include our:

- **Modern Slavery Statement:** Which sets out our stance on modern slavery and explains how employees can identify any instances of this and where they can go for help
- **Staff Handbook:** Our extensive suite of policies is provided to employees at induction and govern our behaviour and conduct expectations
- **Whistleblowing Policy:** Which provides a confidential and anonymous channel for employees to report any concerns or suspicions of wrongdoing, including any breaches of our Modern Slavery Policy
- **Recruitment Policy:** Which ensures that we only hire employees who have the right to work in the UK and that we conduct identity and background checks on all new hires
- **Supplier assessment framework:** We measure suppliers against an internal framework and any suppliers that fail this assessment will undergo a remediation place. If required, we will remove the supplier from our approved supplier register

Our due diligence processes

We have implemented the following due diligence processes to identify and prevent any potential risk of modern slavery or human trafficking in our business and supply chains, we:

- Conduct regular risk assessments of our business activities and supply chains to identify any areas where there may be a higher risk of modern slavery or human trafficking occurring
- Conduct audits and inspections of our own operations and those of our suppliers to verify compliance with our policies and standards and to identify any areas for improvement
- Require all our suppliers to provide us with evidence of their own policies and procedures to prevent modern slavery and human trafficking in their operations and supply chains.



- Monitor and review the performance of our suppliers and terminate any contracts with suppliers who are found to be involved in any form of modern slavery or human trafficking
- Encourage staff to report any concerns on the issues of modern slavery and human trafficking in line with our Whistleblowing Policy

Our effectiveness

We measure the effectiveness of our actions to prevent modern slavery and human trafficking by using the following key performance indicators:

- The number and nature of reports or complaints received through our whistleblowing channel or other means regarding modern slavery or human trafficking
- The number and outcome of audits and inspections conducted on our own operations and those of our suppliers
- The number and percentage of employees and suppliers who have completed our training and received our Staff Handbook
- Our commitment

We are committed to continuously improving our policies and procedures to prevent modern slavery and human trafficking in our business and supply chains. We welcome any feedback or suggestions from our stakeholders on how we can further enhance our efforts in this regard.