



## **Modern Slavery & Human Trafficking Policy**

### **1. Overview and definitions**

- 1.1 We are committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.
- 1.2 Slavery, forced labour, servitude, and human trafficking are types of 'Modern Slavery' – criminal activity that deprives victims of their liberty and usually involves financial and other exploitation. This is abhorrent and totally against what we stand for as a company.
- 1.3 We conduct our business fairly, ethically and with respect to fundamental human rights. We are committed to the prevention of all forms of Modern Slavery, both in our business and in our supply chain.
- 1.4 Anyone who is employed by us or works for or on behalf of us in any capacity must comply with this policy. This includes: employees, directors, consultants, suppliers and service providers.
- 1.5 Failure to comply with this statement may result in disciplinary action, including dismissal, or termination of the contract between you and us. It may also involve other legal steps being taken against you.
- 1.6 Our management team are responsible for this policy.
- 1.7 This policy does not form part of our employment contracts, and we may update it at any time.

### **2. Preventing Modern Slavery in our business**

- 2.1 We carry out appropriate checks on all employees and anyone else working on our behalf, so that we are fully aware who is working for us or on our behalf.
- 2.2 We give every employee a written confirmation of employment, and he or she is paid in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.
- 2.3 All managers are provided with training on this policy



### **3. Our Supply Chain**

- 1.1 Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains. We are not a conventional business that buys in components and manufactures a finished product. Our suppliers are also our customers to whom we are providing a service – these are ethically-minded companies and organisations that wish to help people in need with their surplus tech, while being sustainable through reuse. We take surplus tech, and repair and refurbish for reuse, addressing digital inclusion for people in need.
- 1.2 We require all suppliers and customers to comply with their legal obligations, in relation to Modern Slavery; and to be committed to ensuring that Modern Slavery has no part in their business or supply chain.
- 1.3 If we find a breach of this policy, such as suppliers who are found to have Modern Slavery in their business, or knowingly in their supply chain, we may terminate our contract or relationship and may pursue legal remedies.

### **4. Employees and any others working on our behalf**

- 4.1 We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves. We ask them immediately to report to us any suspicions of Modern Slavery that might have when conducting our business on-site. Our Management team will investigate and take action as appropriate.
- 4.2 Employees or others working on our behalf will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken.

Approved by: Sue Gowling

Date: 29<sup>th</sup> November 2019

Reviewed: 27th January 2026