

## Policy status

This policy was adopted by the Company on 14<sup>th</sup> July 2020 and last reviewed 12<sup>th</sup> October 2022

## Scope

This statement of policy outlines the steps that Statlog Pro Limited take in respect of our legal and ethical responsibilities to ensure, as far as reasonably practical, there is no slavery or human trafficking in any part of our business or our supply chains.

The policy is designed to:-

- Identify and assess potential risk areas in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- Monitor potential risk areas in our business and supply chains
- Provide adequate protection for whistle blowers

This statement of policy, together with our Code of Conduct, Corporate Social Responsibility and Bribery Prevention Policy, forms part of our wider commitment to encourage ethical, social, and environmental responsibility.

## Responsibilities

Statlog Pro Limited opposes the use and exploitation of forced labour and any form of modern slavery, exploitation, or human trafficking. We expect all those who work for us, with us, or on our behalf to share our zero-tolerance approach.

We all have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (including wage and work hours), health and safety and human rights laws and international standards are adhered to. We are committed to raising awareness of the issue and responsibilities amongst our people and suppliers.

All staff and suppliers or contractors who work with Statlog Pro Limited will be expected to comply with this policy.

A breach of this Policy by staff will be considered to be a disciplinary offence and will be dealt with according to Statlog Pro Limited disciplinary procedures.

## Organisational structure

We are a SME software as a service consultancy business, employing circa 10 staff, based in the UK.

## The issue

Forced labour, modern slavery, human trafficking and exploitation are global problems. this affects over 40 million people around the world. Taking steps to tackle this protects vulnerable workers and helps prevent human rights violations.

## Our approach

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

This Policy reflects our commitment to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 and our wider ethical obligations.

## Our staff

We are confident that we do not (and would never) employ forced labour directly within our company.

We carry out pre-employment checks to ensure that all employees are eligible to work in the UK and ask that those in our supply chain also to carry these out for (our infrequent use of) agency workers and temporary staff.

This policy is supported by our other internal policies and HR processes such as our recruitment, disciplinary, equality, diversity, grievance, and whistleblowing policies. All staff are encouraged to take responsibility for ensuring that there is no breach of the Policy and to report any concerns.

We consider risk of modern slavery and human trafficking within our recruitment and employment as very low, although we remain vigilant and will act immediately if an issue is discovered.

## Staff training

We regularly undertaken staff CDP sessions highlighting the risks of modern slavery and human trafficking in our business and supply chains. We communicate the importance of identifying possible incidents of modern slavery, the most effective methods to minimise risk and the need to raise any concerns at the earliest possible stage.

## Our direct supply chain

We operate strict procurement processes, ensuring that our suppliers comply with all applicable laws and standards, including those which relate to the Modern Slavery Act.

We require those within our supply chain to comply with the provisions of the Modern Slavery Act 2015 and take active steps to prevent modern slavery within their business and their supply chains. Where we have third parties providing services, we have well-established process for the engagement of their services, ensuring that their conduct and working practices are consistent with our own. Our Supplier Code of Conduct explains our expectations regarding ethical behaviour for the benefit of all our suppliers.

Our direct supply chains consist of sub-consultants, sub-contractors, and professional services, together with suppliers of services and equipment to our offices. We generally foster long-term relationships with our suppliers, which we believe involves less risk as we have greater knowledge of their operations and policies.

We consider risk of modern slavery and human trafficking within our suppliers as very low. However, we remain vigilant to the risks and have developed a risk-based anti-slavery and human trafficking strategy, which is facilitated by a two-staged risk assessment process.

1. We screen new and existing suppliers against high-level contextual risk factors including country risk factors, sector-specific risk factors and risk factors associated with particular supply chains.
2. Where a supplier presents a higher risk for modern slavery, we escalate the supplier to a more in-depth analysis.

We require all suppliers to adhere to our Supplier Code of Conduct which sets out the ethical standards that must be adhered to in order to do business with us.

We also include specific prohibitions against modern slavery and human trafficking within relevant service agreements and require our suppliers to hold their own suppliers to the same high standards.

## Our contractor, consultant and supplier database

Statlog Pro Limited also maintain a contractor, consultant, and supplier database for use by our clients. Although we have no direct contractual relationship with the contractors, consultants, or suppliers on the database, we do ask them to complete (and keep updated) a PQQ type on-line questionnaire and provide policy documents relating to all aspects of their supply. In respect of Modern Slavery, database suppliers are asked to confirm the following and provide their modern slavery policy: -

### Database PQQ – Modern Slavery

Statlog Pro Limited opposes the use and exploitation of forced labour and any form of modern slavery, exploitation, or human trafficking. We expect all those who use the database (and their supply chains) to actively share our zero-tolerance approach and demonstrate this.

1. Are you a relevant commercial organisation as defined by Section 54 ('Transparency in supply chains etc') of the Modern Slavery Act 2015?
2. Are you compliant with the annual reporting requirements contained within Section 54 of the Act?
3. Have you adopted an anti-modern slavery and human trafficking policy demonstrating how you:-
  - Identify and assess potential risk areas in your business and your supply chains?
  - Reduce the risk of slavery and human trafficking occurring in your business and your supply chains?
  - Monitor potential risk areas in your business and your supply chains?
  - Provide adequate protection for whistle blowers?
4. Please upload your anti-modern slavery and human trafficking policy
5. Do you formally review your policy and its effectiveness at least annually?
6. Do you consider the conduct of each supplier against your policy when awarding or renewing business with the supplier?

7. Do you operate strict procurement processes, ensuring suppliers comply with all applicable laws and standards, including those which relate to the Modern Slavery Act?
8. Do you contractually require your supply chain to adopt your own principles as outlined within your policy in their own policies and through their supply chains?
9. Do you confirm that you will abide by the Statlog Pro Limited Modern Slavery Supplier Code of Conduct?

Unfortunately, we cannot exclude a contractor from the database based on their answers to these questions because some of our clients are actively using these contractors, want to continue to do so, and need to be sure they are at the very least adequately insured. Many contractors are just too small to have robust anti-modern slavery policies and procedures in place (possibly just a one-man band), however, the risk of modern slavery issues with these very small contractors is considered low.

Whilst we are unable to exclude contractors, their answers to these questions and any uploads are available for all using the database to view and make their own judgements on suitability and modern slavery risk.

We also regularly encourage all the contractors on our database to embrace anti-modern slavery principles and update their approach to reflect this.

When Statlog Pro Limited select contractors to tender or work on a project, we do utilise contractors who are actively committed to these anti-Modern Slavery principles as a first call.

### **Statlog Pro Limited Modern Slavery Supplier Code of Conduct**

References in this Code to “forced labour” include slavery, servitude, and any type of forced or compulsory labour as well as trafficking for the purposes of exploitation.

Our expectations of contractors, consultants and suppliers are as follows:

1. Contractors, consultants, and suppliers must not use forced labour.
2. If requested by us (or third parties using our database) contractors, consultants and suppliers will complete and deliver a self-assessment questionnaire provided by us (or the relevant third party) regarding the use of forced labour and the steps they have taken to ensure that it is excluded from their supply chain. Contractors, consultants, and suppliers will provide us with a copy of the completed questionnaire.
3. Contractors, consultants, and suppliers will allow us (or the relevant third party) to audit their compliance with this Code by inspecting their facilities, reviewing records, policies and practices and interviewing personnel. Contractors, consultants, and suppliers are expected to provide prompt access to their facilities, records, documentation, and personnel.
4. If we (or the relevant third party) identify any non-compliance contractors, consultants and suppliers must prepare and permit us (or the relevant third party) to review and execute an improvement plan approved by us (or the relevant third party) to rectify matters.
5. Contractors, consultants, and suppliers will place similar expectations to those set out above on their own suppliers.

We require compliance with this Code in our contracts with contractors, consultants and suppliers and require that they impose equivalent obligations on their own suppliers.

Subject to any contractual terms, we (or relevant third parties) may terminate our (their) supply relationship if a contractor, consultant, or supplier fails to comply with this Code. If appropriate, we (they) may report any breach of this Code to the appropriate authorities.

If you have any concerns or are aware of any suspected violations of this Code, please notify [helpdesk@statlog.co.uk](mailto:helpdesk@statlog.co.uk), and the Legal Department of the relevant company immediately.

This Policy and Supplier Code of Conduct is communicated directly to our staff and suppliers and is also available externally via our website.

Formal review

We formally review this policy annually to ensure it is relevant and up to date.



**Signature:**

**Date:** 12<sup>th</sup> October 2022

**Name:** Andrew Etherington

**Position:** Director