



<b>Modern Slavery Statement</b> Document name	Reference	
<b>Brenda Boyling</b> Created by	<b>01/09/2023</b> Issue date	
<b>Public</b> Protection status	<b>1.1</b> Issue no.	<b>1 of 4</b> Page no.

## Introduction

Modern slavery is a serious crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At iCT4 Limited, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking, both in our operations and throughout our supply chain.

We have taken concrete steps to tackle modern slavery, as outlined in this statement. This document sets out the actions that we take to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking.

## Our business and supply chains

iCT4 provide a range of IT services and solutions to education customers within the UK. Our business is geographically bound within the UK borders, however services from Europe and the USA are delivered via arrangements with our partner companies and suppliers.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references. We only source, procure and enter into cooperation with companies who we are comfortable are held in good moral standing.

At the time of writing, we haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

The highest risk commodity areas have been identified as:

- IT equipment including audio-visual.
- Furniture.

## Risk assessment and outcomes

In the past year, we conducted a risk assessment of our tier 1 supply chain by considering:

- The risk profile of individual countries based on the Global Slavery Index ([Global Slavery Index | Walk Free](#)).
- The business services rendered by the suppliers.

These biennial assessments undertaken help us to determine our response and the risk controls that we implement.

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As part of the risk assessments and the companies learning journey, we have identified that ethical purchasing practices are paramount to minimise modern slavery. Due to the way iCT4 procure most of the common triggers that influence modern slavery are not part of iCT4 processes. iCT4 have committed to ensuring the below aspects are adhered to during iCT4 procurement to minimise modern slavery supplier influence:

1. Accurate technical specifications sent to supplier at point of quote request.
2. No penalties will be applied to suppliers due to last minute changes.
3. All large orders for our customers will always be supplied with a Purchase Order Number from our ordering system which is contractual on issue. This will assist suppliers with security and commitment with high volume large orders. Suppliers will also be informed of required lead times.
4. Due to iCT4 procurement practices, equipment that is purchased from suppliers is in stock, made to order or a published ETA therefore short lead times are not possible. If the item is not available or made to order is not possible in the set time frames it is not procured, which will discourage short lead demands/times.
5. iCT4 pay suppliers on a 30-day payment schedule, some large tier 1 suppliers offer extended standard terms. Any request for extended terms is risk assessed and openly discussed with the suppliers to ensure there is no threat to their company / cash flow / non ethical procedures.

## Policies

iCT4 Limited operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.
- Staff Handbook – covers all areas of employment contract along with acceptable behaviour, disciplinary policies, staff recruitment, adherence to local and national laws, freedom of employee contract termination, freedom of movement, outlines unacceptable behaviour related to violence, harassment and intimidation, details non-compulsory overtime.
- Equal Opportunities Policy – details prohibited discrimination.
- Safeguarding policy – details process and procedures for protecting children.

## Supplier due diligence

iCT4 limited conducts due diligence on all new suppliers during on-boarding. This includes:

- Assessing risks in the provision of particular services.

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- Auditing the suppliers' policies and procedures.
- Requiring improvements to substandard employment practices.
- Sanctioning suppliers that fail to improve their performance in line with our requirements.

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour.
- Their employees work voluntarily and are entitled to leave work.
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment.
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons.
- They don't require employees to surrender their passports or work permits as a condition of employment.

If a supplier fails to implement anti-slavery policies or controls and or is found to be promoting or using modern slavery, the supplier will no longer be used during procurement and any contracts will be terminated.

## Reporting

Employees should report any suspicions of modern slavery to the Managing Director. This can be reported direct, via whistleblowing procedures or anonymous reporting. The information provided will be acted upon in strict confidence where the reporter will remain anonymous.

Employees have a duty to report if they become aware of modern slavery within the supply chain including within iCT4.

## Awareness

iCT4 Limited has raised awareness of modern slavery issues by requesting an attestation from employees that they will abide by iCT4 Modern Slavery policy and uphold iCT4 Modern Slavery Statement.

## Training

In addition to the awareness programme, iCT4 Limited has rolled out an e-learning course to all employees, which covers:

- Various forms of modern slavery in which people can be held and exploited.
- The size of the problem and the risk to our organisation.
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices.
- How employees should respond if they suspect slavery or human trafficking.
- What external help is available for the victims of slavery.

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## Measuring performance

iCT4 Limited has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- 100% of employees have completed mandatory training.
- A completed audit showing tier 1 supply companies 100% compliance.
- 100% of suppliers have rolled out an awareness and training programme and have compliant and appropriate policies in place.
- 100% of reports received from employees that indicate their awareness of and sensitivity to ethical issues.

## Company objectives for the future

Initial focus has been on tier 1 supply companies e.g. distributors, this will be expanded to tier 2 for example the manufacturers of computer equipment in the forthcoming year.

## Approval

Our Modern Slavery Statement was approved by the board of directors and was formally implemented by the Managing Director and is issued on a version-controlled basis.

Glyn Pascoe  
Managing Director  
01/09/2023

## Change history record

Issue	Description of change	Date of change
1.1	Initial issue	01/09/2023

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