

HybrIT Services

Modern Slavery and Human Trafficking Policy

Internal Document



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Modern Slavery and Human Trafficking Policy

1 Policy Introduction

The statement sets down HybrIT Services Ltd (The Company's) commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

2 Organisational structure and supply chains

This statement covers the business activities of The Company which are as follows:

The Company is a Systems Integrator and Managed Service Provider. The Company's customers range from large corporate, medium business to SME and are from a wide range of verticals from financial services, public sector and legal to national retail. HybrIT has several routes to market with extensive partnerships within the IT channel and a growing direct business.

The Company currently operates in the United Kingdom and New Zealand.

3 High Risk Activities

Responsibility for the Company's anti-slavery initiatives are as follows:

- ❖ The Group Head of HR is responsible for creating and reviewing policies. The process by which policies are developed is in line with UK employment Law, HR best practice and in alignment with the core values of The Company.
- ❖ The Group Head of HR is responsible for Health and Safety including risk assessments in respect of human rights and modern slavery.
- ❖ The Group Head of HR is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.
- ❖ The Group Head of HR is responsible for the rigorous onboarding checks at the point of recruitment and prior to an offer of employment to a suitable candidate.

4 Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to read and discuss this policy and related processes on an annual basis with their line manager.

5 Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking.

- ❖ Whistleblowing policy. The Company encourages all its workers, customers, and other business partners to report any concerns related to its direct activities or its supply chains.
- ❖ Code of Conduct. The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.

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- ❖ Corporate Social Responsibility (CSR) Policy. The Company's CSR policy summarises how we manage our environmental impacts and] how we work responsibly with suppliers and local communities.

6 Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and/or evaluating the modern slavery and human trafficking risks of each new supplier and/or invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

7 Performance indicators

This Modern Slavery and Human Trafficking Policy will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.