

# Modern Slavery Statement.

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<b>Approved by</b>	Ben Ramsdale, Chief Commercial Officer
<b>Review date</b>	08 June 2023
<b>Classification</b>	Public

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# 1. Modern Slavery Statement

Connect Managed Services (UK) Limited (“Connect”) is committed to improving awareness of the practices necessary to combat slavery and human trafficking and to continually assess the risk profile of our business in these areas.

Connect is a trusted communications partner that draws on over 30 years of knowledge and experience to solve complex communications challenges in three areas: Contact Centres, Unified Communications and Network Services. Our truly vendor-agnostic capability allows us to build completely bespoke solutions for our businesses. We support a diverse range of blue-chip organisations across the globe in the deployment and management of Unified Communications, Contact Centre and Network Services environments.

We have an annual turnover in excess of the £36 million threshold specified in the Modern Slavery Act 2015.

Our business is organised into Sales, Solution Design and Implementation, Project Management and Operations with supporting functions of Finance, Commercial, Legal, IT, HR and Compliance. Our Head Office is located in the UK and we have additional offices in India, South Africa and USA. Procurement is run from our London HQ and Operations are run from India, South Africa, UK, and USA offices.

Our Anti-Slavery and Human Trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships and to ensure that slavery and human trafficking are not taking place in any part of our operations and supply chain.

## Company Process and Policy

In our Internal Operations, we have the following policies in place in order to support our commitment to respecting human rights:

- Anti-Bribery & Corruption Policy
- Anti-Fraud Policy
- Anti-Slavery and Human Trafficking Policy
- Dignity at Work Policy
- Equal Opportunities Policy
- HR Security/Recruitment Policy
- Whistle-blowing Policy

The Pre-employment screening process that is part of our HR Security Policy upholds our respect for labour rights and includes the review of individuals’ proof of identity, address, and right to work status. We review our pay rates annually to ensure minimum rates are above the statutory minimum and living wage requirements that are applicable in the countries we operate in.

As part of our sales process, we operate a robust costing and approval process to ensure that pricing is adequate.

## Supplier Management

Our suppliers have a contractual obligation to ensure compliance with all applicable laws that apply to their supply of goods and services to us, regardless of the jurisdiction in which they operate. Supplier management is carried out in accordance with our Supplier Management Process and Policy. It includes an onboarding process to ensure that suppliers and third parties agree to adhere to our Anti-Slavery and Human Trafficking Policy before we engage them. Supplier Management includes annual reviews with key suppliers, and we have developed the Supplier Review format this year in order to include confirmation of continued compliance with our Anti-Slavery and Human Trafficking Policy.

## **Risk Assessment**

Using the Social Responsibility Alliance's recommended template, we have undertaken a review to identify and assess potential risk areas in our relationships with our contractors and suppliers and maintain a register detailing the same.

We have identified that we have a few suppliers who potentially pose a higher risk, given the locations in which the services are provided. We will mitigate this by assessing the skill levels of workers and by having contractual controls in place requiring our suppliers to agree to our Anti-Slavery and Human Trafficking Policy.

## **Training & Communication**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we have included our Anti-Slavery and Human Trafficking policy in our Staff Handbook, which is easily accessible by all staff on our online training platform. All staff are asked to confirm that they have read and understood the Policy.

All Connect staff are encouraged to report any concerns regarding slavery and /or human trafficking in accordance with our Whistleblowing Policy.

## **Progress in 2022/2023**

- We have included more specific wording in our Anti-Slavery Policy to assist employees and suppliers in identifying incidents of modern slavery and human trafficking and how to report.
- We have improved our Supplier Management Risk Assessment Process by requesting confirmation of continued compliance from key suppliers.
- We have incorporated our Connect South Africa services into our annual risk assessment.

## **Looking Ahead**

- We will develop a specific Supplier Code of Conduct Policy set over the next 12 months.
- We will provide online Modern Slavery training to all staff within the next 12 months.
- We will include contractual controls requiring new suppliers to our Connect South Africa entity to agree to our Anti-Slavery and Human Trafficking Policy.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our anti-slavery and human trafficking statement for the financial year ending 30 April 2023.

**Signed by Ben Ramsdale, Chief Commercial Officer on behalf of the Board of Directors**

Connect Managed Services (UK) Limited – 02 June 2023

## 2. Information Classification

This policy is classified as Public.

## 3. Review

This Policy shall be reviewed on an annual basis, unless changes to business operations, relevant legislation or codes of practice necessitate an earlier amendment.

## 4. Version Control

Date	Version	Changes	Reviewer Name & Job Title	Approver Name & Job Title
28/7/2020	V1.4	Branding updated and version control table added. Wording amended to reflect additional responsibilities of turnover being greater than £36m.	Fiona Thompson, Compliance Manager	Alex Tupman, CEO Martin Cross, CTO Pete Francis, CFO
02/06/2021	V1.5	Inclusion of 2020 progress and update of targets for 2021.	Fiona Thompson, Compliance Manager	Adam Young, CEO Martin Cross, CTO Pete Francis, CFO
17/6/2021	V1.6	New Branding Applied	Fiona Thompson, Compliance Manager	Adam Young, CEO Martin Cross, CTO Pete Francis, CFO
8/6/2022	V1.7	Annual Review – inclusion of 2021/2022 progress and update of targets for 2022/2023	Dimitris Damianou, Paralegal  Fiona Thompson, Compliance Manager	Adam Young, CEO Martin Cross, CTO Pete Francis, CFO
8/6/2023	V1.8	Annual review – Rebrand, inclusion of 2022/2023 progress and update of targets for 2023/2024	Dimitris Damianou, Paralegal	Adam Young, CEO Ben Ramsdale, CCO Bruce Arnold, CEO (South Africa) Gert Swart, CTO Glen Robinson, COO Martin Cross, CTO Pete Francis, CFO Stephen Fricker, CRO