

**Anti-slavery and human trafficking policy**

Edition 2 October 2020

**1. OUR COMMITMENT**

**1.1** Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. 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.

**1.2** We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, whether in the receipt of support of our delivery of our consultancy services or generally in the receipt of services from our business partners.

**1.3** We expect the same high standards from all of our suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers and business partners will hold their own suppliers to the same high standards.

**1.4** This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, volunteers, interns, agents, contractors, suppliers, third-party representatives and business partners.

**1.4** This policy does not form part of any employee's contract of employment or any contractor or third-party contract of services and we may amend it at any time.

**2. RESPONSIBILITY FOR THE POLICY**

**2.1** The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

**2.2** The Operations Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

**2.3** Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

**2.4** You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the Operations Manager.

**3. COMPLIANCE WITH THE POLICY**

**3.1** You must ensure that you read, understand and comply with this policy. In particular, you should read Annex A of this policy which sets out the offences of Section 1 and Section 2 of the Modern Slavery Act 2015 together with Section 3 which sets out the definition of exploitation.

**3.2** The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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**3.3** You must notify your manager or the Operations Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

**3.4** You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

**3.5** If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Operations Manager or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains. We may also remove an organisation from any preferred supplier list that we may operate from time to time, or generally not deal with any supplier. We may also pass details to appropriate law enforcement bodies as applicable.

**3.6** If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the compliance manager.

**3.7** We undertake the following steps within our business operations to try help us minimise the risks of such activity within our supplier chains:

- All suppliers and business partners must comply with a number of compliance requirements of ours in order to supply work seekers to us when supporting our digital services to our customers;
- All suppliers and business partners to our organisation are required to evidence their modern slavery statements and policies (and we educate very small suppliers such as individual contractors whether operating on a self-employed basis or through their own limited company which they manage and control on the impact of and prevention of modern slavery and human trafficking);
- We undertake audits and spot checks and related due diligence on our supplier chains from time to time;
- Suppliers and business partners may be asked to complete a questionnaire on how they tackle modern slavery in their supply chain (as applicable);
- Our contracts with suppliers require warranties and undertakings in respect of modern slavery and human trafficking and we seek provisions in respect of compliance with modern slavery legislation in our business partner contracts where business partners are working to their own terms of business with us and such commitment is absent;
- We undertake training and awareness amongst our staff, particularly those staff whom operate payroll within our finance team and those staff who work closely with our suppliers when delivering transformation programmes for our customers.

**3.8** As part of our commitment and effort in this area, we have prepared a modern slavery statement which will be reviewed on an annual basis, and which is set out as Annex B to this policy which can be released to evidence our compliance and steps we have taken, whether in response to bids/tenders or at the request of our customer.

**3.9** We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our

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own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which you may obtain from our HR manager.

### 4. COMMUNICATION AND AWARENESS OF THIS POLICY

**4.1** Training on this policy, and any risks our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

**4.2** Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### 5. BREACHES OF THIS POLICY

**5.1** Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

**5.2** We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

### 6. APPROVAL AND REVIEW OF THIS POLICY

**6.1** This policy was adopted on 1<sup>st</sup> November 2019 having been reviewed and revised on 21<sup>st</sup> October 2020 and is agreed by our board of directors.

**6.2** This policy will continue to be reviewed on an annual basis by the Operations Manager on behalf of our board of directors.

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**Annex A – definitions contained in the Modern Slavery Act 2015****Section 1 - Slavery, servitude and forced or compulsory labour**

(1) A person commits an offence if—

- (a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- (b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

(2) In subsection (1) the references to holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention.

(3) In determining whether a person is being held in slavery or servitude or required to perform forced or compulsory labour, regard may be had to all the circumstances.

(4) For example, regard may be had—

- (a) to any of the person's personal circumstances (such as the person being a child, the person's family relationships, and any mental or physical illness) which may make the person more vulnerable than other persons;
- (b) to any work or services provided by the person, including work or services provided in circumstances which constitute exploitation within section 3(3) to (6).

(5) The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.

**Section 2 – Human trafficking**

(1) A person commits an offence if the person arranges or facilitates the travel of another person (“V”) with a view to V being exploited.

(2) It is irrelevant whether V consents to the travel (whether V is an adult or a child).

(3) A person may in particular arrange or facilitate V's travel by recruiting V, transporting or transferring V, harbouring or receiving V, or transferring or exchanging control over V.

(4) A person arranges or facilitates V's travel with a view to V being exploited only if—

- (a) the person intends to exploit V (in any part of the world) during or after the travel, or
- (b) the person knows or ought to know that another person is likely to exploit V (in any part of the world) during or after the travel.

(5) “Travel” means—

- (a) arriving in, or entering, any country,

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- (b) departing from any country,
- (c) travelling within any country.

(6) A person who is a UK national commits an offence under this section regardless of—

- (a) where the arranging or facilitating takes place, or
- (b) where the travel takes place.

(7) A person who is not a UK national commits an offence under this section if—

- (a) any part of the arranging or facilitating takes place in the United Kingdom, or
- (b) the travel consists of arrival in or entry into, departure from, or travel within, the United Kingdom.

**Section 3 – Meaning of Exploitation**

(1) For the purposes of section 2 a person is exploited only if one or more of the following subsections apply in relation to the person.

Slavery, servitude and forced or compulsory labour

(2) The person is the victim of behaviour—

- (a) which involves the commission of an offence under section 1, or
- (b) which would involve the commission of an offence under that section if it took place in England and Wales.

Sexual exploitation

(3) Something is done to or in respect of the person—

- (a) which involves the commission of an offence under—
  - (i) Section 1(1)(a) of the Protection of Children Act 1978 (indecent photographs of children), or
  - (ii) Part 1 of the Sexual Offences Act 2003 (sexual offences), as it has effect in England and Wales, or
- (b) which would involve the commission of such an offence if it were done in England and Wales.

Removal of organs etc

(4) The person is encouraged, required or expected to do anything—

- (a) which involves the commission, by him or her or another person, of an offence under section 32 or 33 of the Human Tissue Act 2004 (prohibition of commercial dealings in organs and restrictions on use of live donors) as it has effect in England and Wales, or
- (b) which would involve the commission of such an offence, by him or her or another person, if it were done in England and Wales.

Securing services etc. by force, threats or deception

(5) The person is subjected to force, threats or deception designed to induce him or her—

- (a) to provide services of any kind,
- (b) to provide another person with benefits of any kind, or
- (c) to enable another person to acquire benefits of any kind.

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Securing services etc. from children and vulnerable persons

(6) Another person uses or attempts to use the person for a purpose within paragraph (a), (b) or (c) of subsection (5), having chosen him or her for that purpose on the grounds that—

(a) he or she is a child, is mentally or physically ill or disabled, or has a family relationship with a particular person, and

(b) an adult, or a person without the illness, disability, or family relationship, would be likely to refuse to be used for that purpose.

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### Annex B - Modern Slavery Statement (Voluntary Statement issued to Customers on request)

This statement is made as part of Tecknuovo Limited's commitment to eliminating the exploitation of people under modern slavery legislation. It summarises how Tecknuovo operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff. This statement may be provided to any customer seeking a statement from us as to our compliance with modern slavery legislation.

#### Our Business

We are a niche supplier of consultancy services and we specialise in the devOps, cloud and open source space acting as a specialist service provider in the provision of the delivery of digital consultancy services including the ability to deliver end-to-end digital transformation programmes. We do use specialist contractors and suppliers to support aspects of our delivery of our programmes for our customers as we may require and who are predominately based in the UK. As we deliver our projects direct to our customers, we do not have complex or particularly long supply chains. Based on our business structure and assessment, we do not believe that we operate in an industry or sector which is subject to a high risk of labour exploitation or other forms of slavery and human trafficking however we are committed to preventing any such practices occurring.

In addition to the delivery of our services to our customers, we do also use business partners to supply us with technology, infrastructure and other support needed to run our business (e.g. IT, utilities, and professional services).

#### Our Commitment

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.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, whether in the receipt of support of our delivery of our consultancy services or generally in the receipt of services from our business partners.

We expect the same high standards from all of our suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers and business partners will hold their own suppliers to the same high standards.

#### Our Policies

Tecknuovo has a modern slavery policy, which is available upon request. Tecknuovo's policies are established by its directors based on advice from HR professionals, industry best practice and legal advice and from input from our own staff. Policies are reviewed on an annual basis by our Operations Manager.

#### Minimising Risk of Modern Slavery

We take the following steps and have set up the following procedures to investigate and ensure that modern slavery does not take place in any part of our business or supply chain:

- When engaging with suppliers and our business partners, we ask for evidence of their processes and policies,

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including commitments with respect to modern slavery, human trafficking, forced labour, human rights, and whistleblowing.

- Suppliers who support our digital transformation projects with our customers are required to enter into our standard contracts with us for the supply of services which include contractual commitments in respect of their compliance with modern slavery legislation. We review and ensure that our business partners, who operate under their own terms of business, provide a contractual commitment with respect to their compliance with modern slavery legislation.
- Suppliers who support our digital transformation projects are required to comply with our Suppliers Code of Conduct.
- We conduct audits before entering into a commercial relationship with any business that may support us in the operation of our business to ensure that we minimise the risk of modern slavery in our supplier chain.
- New suppliers and business partners are asked to complete a questionnaire on what they do to prevent modern slavery within their organisation and their supply chain (as applicable).
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or business partner and or conducting spot checks.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.

In addition, our suppliers are required to ensure that they:

- Do not discriminate, harass, and or victimise, any of their employees and or any other persons;
- Maintain suitable and effective health and safety policies and procedures to ensure the health and safety of all of their employees and other persons for whom they have a responsibility to ensure their health and safety;
- Pay their employees no less than the national minimum rates of pay applicable;
- Act in accordance with all applicable laws; whether national and or EU

Our staff are encouraged to bring any concerns they have to the attention of management.

### Our Compliance

We have a operations manager, legal and HR support to ensure our compliance with applicable laws and with our policies and procedures across our business. Our operations manager regularly monitors our performance and compliance through audits of our business processes and procedures to ensure continued compliance; and which focuses in particular to our compliance with our pre-engagement audits of suppliers and business partners, and their compliance with their contractual commitments and conduct requirements.

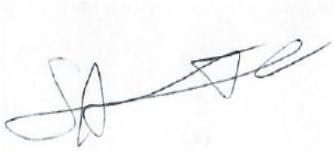
### Our Training

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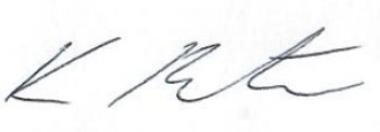
All of our staff receive training and support that is appropriate to their role. In particular our project team leads, resource managers, and finance team undertake training that will include guidance around modern slavery and human trafficking as applicable. Where relevant to their role, staff will receive awareness-raising information around issues involving modern slavery and human trafficking, and which will enable them to bring any concerns they have to the attention of management. As part of this, our staff are encouraged to discuss any concerns that they have.

This statement was approved by the board of directors on 1<sup>st</sup> November 2019.

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Gus Sargent  
Director

A handwritten signature in black ink, appearing to read 'Kieran Blackstone'.

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Kieran Blackstone  
Director