

# IT Ninjas Modern Slavery Policy

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that IT Ninjas Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business operations or our supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. IT Ninjas Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## Our business

IT Ninjas Limited operates predominantly in the Information and Technology markets of the UK, with additional business activities around the world covering client subsidiary's.

IT Ninjas Limited source most the materials associated with its operations in the UK with components coming from reputable manufacturing partners around the world with whom we maintain a close working relationship.

## Our high-risk areas

In regular assessment and monitoring of our business operations it is of paramount importance that we systematically consider our wider business and assess possible high-risk areas to ensure that they are free from slavery, servitude, human trafficking and forced labour.

The area of our business which warrants the greatest contemplation is our involvement with other suppliers, including those who operate outside of the UK. We must be diligent in assessing the operations of all the international suppliers we engage with. In the provision of robe production, we operate with suppliers around the world and have taken steps to ensure that the conditions of staff working for the supplier are fair and in line with our commitment to anti-slavery measures. In view of this commitment we have taken the opportunity of making sure our suppliers are inspected by independent assessors to confirm they work within our policy and guidelines.

## Our policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Code of business conduct. This code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

#### Our suppliers

IT Ninjas Limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organisation has never been convicted of offenses relating to modern slavery and on-site audits which include a review of working conditions in instances where we perceive a higher risk. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

#### Training

We regularly conduct training for our procurement/buying teams so they understand the signs of exploitation.

#### Our performance indicators

We use the following to monitor the effectiveness of our policy.

Number of reports received from employees.

Number of approaches from the public.

Reports by law enforcement agencies to indicate that modern slavery practices have been identified.

Employee engagement.

Approval for this statement

This statement was approved by the Board of Directors on 1<sup>st</sup> January 2018.

Modern Slavery Policy

Anti-slavery and human trafficking policy

## 1. Policy statement

- 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 have a zero-tolerance approach to modern slavery and 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, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, 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 will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 2. Responsibility for the policy

- 2.1 The Board 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 Head of Procurement 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.

1.1 Line managers 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.

1.2 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 Board.

## 2. Compliance with the policy

2.1 You must ensure that you read, understand and comply with this policy.

2.2 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.

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

2.4 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.

2.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

2.6 If you are unsure about whether an 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 board.

2.7 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 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 board immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## 3. Communication and awareness of this policy

3.1 Training on this policy, and on the risk 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.

1.1 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 2. Breaches of this policy

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

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