



ISO 9001:2015 – 4.2

Centerprise Group Anti-Slavery and Human Trafficking Policy (Including Modern Slavery Statement for year ended 2021)

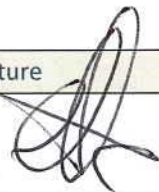


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COMPANY PROPRIETARY INFORMATION

Prior to use, ensure this document is the most recent revision by checking the Master Document List. To request a change, submit a Document Change Request to the Document Control Representative.

Approvals

The signatures below certify that this policy has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

| | Name | Signature | Position | Date |
|--------------------------|-------------|---|-------------------------------|------------|
| Prepared by | Chris Hunt |  | Group Quality Manager | 14/02/2022 |
| Reviewed and Approved by | Sam Lailey |  | Group HR and Support Director | 23.22 |
| Approved by | Jeremy Nash |  | CEO | 21/3/22 |

Amendment Record

This Policy is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

| Page No. | Context | Revision | Date |
|-----------------------|--|----------|------------|
| | Initial Issue | 1 | 09/12/2016 |
| 1, Header, 3 | Review of policy, Removal of ISO 9001:2008 references | 2 | 08/01/2018 |
| 8 | Introduction of Annex A | 3 | 16/11/2018 |
| 3, 4, 9, 10, 11, & 12 | Revision of the Policy and additions made to Appendix A. | 4 | 24/04/2019 |
| 4, 8, 10 & 12 | Review of Policy, removal of OH&S 18001 and insertion of ISO 45001 The following amendments to App. A: Review of Supply chain data, Removal of Brexit readiness, Training of staff | 5 | 27/03/2020 |
| 6,7, 8, 9, 10, & 12 | Annual Review of Document – Changes to wording in main body of the document, Review of products and services sourced conducted with Purchasing Manager determined that no change required. Update to ISO certifications. Included Money Laundering and Anti-Bribery training | 6 | 28/01/2021 |
| 9, 12 | Change to the Supplier Questionnaire, JOSCAR and ILO reference, additional references to the IHASCO Training (Equality, Diversity and Inclusion & Bullying and Harassment for Managers) | 7 | 14/02/2022 |

Supporting documentation:

| Ref | Title & Description+ | |
|----------|-------------------------------------|------------------------------|
| QM001 | Quality Management Manual | ISO 9001:2015 |
| QM001.1 | Risk Management Strategy | BS31100:2011 / ISO 9001:2015 |
| QM001.4 | Group Equality and Diversity Policy | ISO 9001:2015 |
| QM001.5 | Group Ethical Trading Policy | ISO 9001:2015 |
| QM001.7 | Corporate Social Responsibility | ISO 9001:2015 |
| QM003.4 | Environmental Aspects Register | ISO 14001:2015 |
| QM007.5 | Business Continuity Risk Register | ISO 22301:2012 |
| QM005.3 | IT Security Risk Register | ISO 27001:2013 |
| QM005.15 | Child Protection Policy | ISO 27001:2013 |
| QM006.11 | OH&S Guidance - Risk Assessments | ISO 45001:2018 |
| QP005 | Training and Awareness Procedure | ISO 9001:2015 |
| QP010 | Purchasing Procedure | ISO 9001:2015 |
| | Staff Handbook | |

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Centerprise Group Anti-Slavery and Human Trafficking Policy

1. Policy Statement

- 1.1 As an organisation that supports fairness, equality and diversity, we wholeheartedly welcomed the introduction of the Modern Slavery Act 2015. 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 our all business dealings and relationships. We will not trade or partner with any business or organisation which is involved in this shocking practice however remotely or indirectly.
- 1.2 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, agents, contractors, external consultant and third-party representatives and business partners.
- 1.3 This policy does not form any part of any employee's contract of employment and we may amend it at any time.
- 1.4 We review the risks that our supply chains can present. We expect our suppliers and contractors to demonstrate a zero-tolerance approach to exploitation.

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 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.
- 2.3 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 HR & Support Director. This policy sets out Centerprise International Ltd's commitment to its suppliers and customers by setting out the measures we are taking to ensure that we are acting in an ethical manner.

3. Compliance with the Policy

- 3.1 All Centerprise employees are to read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all employees and those working under our control. Individuals are required to avoid any activity that might lead to or suggest a breach of this policy.
- 3.3 Individuals must notify their manager or the HR & Support Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

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- 3.4 Individuals 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 an individual suspects a breach of this policy has occurred or that it may occur they must notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible.
 - 3.6 If an individual is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, they are to raise their concern with their manager or HR & Support Director.
 - 3.7 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 an individual believes that they have suffered any such treatment, they should inform the HR & Support Director immediately. If the matter is not remedied, and the individual is an employee, he/she should raise it formally using our Grievance Procedure.

4. Communication and Awareness of this Policy

- 4.1 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 refresher training is provided annually.
- 4.2 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.

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.

Appendix A. – Modern Slavery Statement 2021

Centerprise International Holdings Ltd (CIHL) is opposed to slavery and human trafficking in any part of our Group activities or our supply chain. We are therefore committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

We met the turnover threshold applicable under section 54 of the Modern Slavery Act 2015 in the period covered by this statement.

Our Business

The CI Group is made up of a holding company and a number of subsidiaries and brands that combine together to provide market leading solutions to our private and public-sector customers. The activities of the Group are varied and include business and gaming computer manufacturing; the distribution and reselling of ICT products; the provision of ICT solutions and managed services; the provision of Disaster Recovery and Business Continuity services; the end-of-life management of IT hardware; and the provision of IT Asset Management services. The Group entities and what they stand for are listed below.

- **Centerprise International Ltd (Main Trading business within CIHL)**

Centerprise International is the main trading company of the Group. It was established in 1983 and has a strong reputation as one of the UK's most respected IT providers. Centerprise has a strong presence within the UK public sector and has an ever-growing footprint within the private sector. Centerprise has been a trusted supplier to the MOD for more than 30 years and is also a significant supplier of IT products, solutions, and services within the Education, Central and Local Government, Emergency Services and Healthcare sectors.

- **ADAM Continuity (Dormant Company – Retained Brand trading within CIL)**

ADAM Continuity is the Group's brand for the delivery of best-in-class Business Continuity and Disaster Recovery services. Through our ADAM services, we help manage and control an organisation's business risks by providing expert advice and solutions in Cloud and IT recovery services. The services provide peace of mind to our customers allowing them to focus on delivering their core business objectives.

- **YOYO Tech (Dormant Company – Retained Brand trading within CIL)**

YOYOTech is a leading manufacturer of custom-built PCs and overclocking. Established in 2002, YOYOTech became part of the Centerprise Group in 2013. YOYOTech have held the world performance record on several occasions and take great pride in the creation of every new system.

Our Supply Chains

The majority of the products we sell are sourced from reputable suppliers based in the UK and the European Union. We also source a number of products / services from India, China, Hong Kong, Singapore, Taiwan and the United States.

In this financial year the volume of products and services sourced are:

- UK 85%
- EU Countries 4%,

- USA 2.6%,
- Taiwan 7%
- China (including HK) 0.78%,
- Singapore 0.6%
- India 0.02%

Purchasing of goods and services are conducted as described in our Purchasing Procedure (QP010). Under this procedure suppliers (except for Tier 1 Suppliers) are required to complete our online Supplier Questionnaire form (QWI 5.3.1f1), which includes the following questions:

- *In line with the Modern Slavery Act 2015, do you have an Anti- Slavery and Human Trafficking Policy?*
- *Does your organisation provide its services and/or products manufactured observing Human Rights and International Labour Standards (ILO)?*

On receipt of the completed Supplier Questionnaire, due diligence is carried out by the Accounts department. As part of our commitment to be transparent in our procurements of our products, Centerprise International has successfully for the 3rd year been enrolled into the Joint Supply Chain Accreditation Register (JOSCAR). This is an accreditation system utilised by the aerospace, defence and security sectors to demonstrate compliance to the following elements:

- Business continuity
- Counterfeit Products/Materials
- Insurance and third-party certification
- Health and safety
- Environmental and sustainability
- IT security
- Modern slavery
- Anti-bribery and corruption
- Product safety and quality
- Supply chain

Supplier Non-Conformity

In the event of a supplier non-conformance to this policy, several actions may take place, including:

- Immediate discontinuation of business
- Document through a Supplier audit with supporting evidence where possible
- Purchasing Team to engage with the supplier to resolve and develop a corrective plan.

Corporate Policies

Centerprise International Ltd is committed to ethical trading and promoting sustainability in all of its activities. We demonstrate these commitments through the successful certifications to the following International Standards:

- ISO 9001:2015 Quality Management Systems
- ISO 10002:2018 Customer Satisfaction
- ISO 14001:2015 Environmental Management
- ISO 20000:2018 IT Service Management
- ISO 22301:2012 Business Continuity
- ISO 27001:2013 IT Security
- ISO 45001:2018 Occupational Health and Safety Management

As required by these ISO Standard Policies and Procedures have been produced to support the companies statutory and legal obligations.

To support these certifications Centerprise International conducts audits to meet its obligations and is subject to external audits that demonstrate compliance.

These certifications have been audited in line with ISO certification rules and re-certification obtained every 3 years as prescribed by UKAS.

These Standards working in conjunction with the company handbook inform our employees of the following codes of conduct:

Pre-employment:

- Recruitment Policy – includes Equality & Diversity

Polices during employment:

- Health and Wellbeing Policy
- Equal Opportunities and Non-Discrimination Policy
- Equal pay Policy
- Grievance Policy
- Working Time Regulations
- Whistleblowing Policy

Conduct Policies:

- Anti-Harassment and anti-bullying
- Confidential Policy
- Disciplinary Rules

Our Specific Policies on Slavery and Human Trafficking

This document sets out our group commitment to acting ethically and with integrity towards our employees and in all our business relationships. In addition to this document listed as part of our ISO 9001 Policy and Procedures the following documents have also been produced:

- QM001.4 Group Equality and Diversity Policy
- QM001.5 Group Ethical Trading Policy
- QM001.7 Corporate Social Responsibility
- QM005.15 Child Protection Policy

Focus on Employee Welfare

Providing a safe and healthy working environment is core to Centerprise International Ltd operating principles. We equip employees with products and equipment that are safe to use. We focus on implementing and improving processes and controls under our OH&S 18001 certification to prevent work related accidents, injuries and illnesses.

Our H&S policies and staff handbook focuses on creating and maintaining a workplace that provides an environment that is safe for employees and reinforces the importance on this at every site owned by the business.

Risk Assessment

As describes under Corporate Policies. Centerprise International has a number of ISO Certifications to which the Group adheres to. Under theses ISOs the following Risk Registers are held:

- ISO 9001:2015 Risk Management Strategy
- ISO 14001:2015 Environmental Risks
- ISO 22301:2012 Business Continuity Risks
- ISO 27001:2013 Security Risks
- ISO 45001:2018 Occupational and H&S Risks

Whilst most of the products and services are sourced from Tier 1 Suppliers, Centerprise International regularly attend COMPUTEX events in the Far East where the senior management / Purchasing Teams will visit production facilities, of both existing and potential new suppliers to carry out due diligence.

Measuring Effectiveness

The Purchasing department in conjunction with the Accounts and Quality Departments regularly carry out reviews of our Suppliers to ensure that compliance is being achieved.

Training for Staff

As part of our commitment to ensure that this policy is communicated, staff are informed of the requirements of this policy as part of their induction process. Furthermore, staff are required to undertake annual refresher training on topics that support adherence to this policy.

Internal related training includes:

- Inductions (HR / Purchasing / ISO)
- Monthly newsletters
- Information on the H&S Noticeboard
- Online training portal. Training through this medium includes the following aspects:
 - Equality, Diversity and Inclusion
 - Bullying and Harassment for Managers
 - Modern Slavery
 - Anti-Bribery
 - Anti-Money Laundering

A training and awareness procedure (QP005) is recorded under ISO 9001:2015. All training needs are co-ordinated through HR.