



MODERN SLAVERY AND HUMAN TRAFFICKING

STATEMENT

11 November 2019

DOCUMENT INFORMATION

DOCUMENT TITLE: Modern slavery and human trafficking Statement

SECURITY CLASSIFICATION: Confidential

AUTHOR: HR

DATE: 19 November 2019

VERSION	DATE	SUMMARY OF CHANGES	AUTHOR
1.3	19/11/19	Templated	Jane Dance

REVIEWER

NAME	ROLE	DATE APPROVED	VERSION
------	------	---------------	---------

DISCLAIMER

This document contains confidential information about IPI Ltd and its customer.

No part of its contents may be used, copied, disclosed or conveyed to any other party in any manner without prior permission from IPI Ltd.

This document is stored and maintained electronically. If any doubt exists as to the current version of the printed copy, reference should be made to the Document Owner/Manager for verification. Proposed changes must also be sent to the Document Owner.

All intellectual property contained within this document remains solely the property of IPI Ltd and cannot be copied, disclosed or conveyed to any other party in any manner without prior permission from IPI Ltd.

INTRODUCTION

This statement sets out IP Integration's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the Communications, IT and Telecommunications sector, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Company Structure and Supply Chains

This statement covers the activities of IP Integration Limited:

- The provision of technology infrastructure for organisation;
 - covering contact centres, Intelligent Networks, IT Services, Unified Communication solutions; and consultancy

Countries of operation and supply

The Company currently operates in the following countries:

- United Kingdom
- Philippines

The Company will follow a process in order to assess whether or not particular activities or countries are high risk in relation to slavery or human trafficking.

Responsibility

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

- **Policies:** The Human Resources department are responsible for the development of policies which are then approved by the Senior Management Team, before being communicated to staff and relevant suppliers.
- **Risk assessments:** Responsibility for conducting the human rights and modern slavery risk analysis is managed by the key Company interface for the Client within each country.
- **Investigations/due diligence:** The Operations, Finance and Human Resources Departments are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.

Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Procurement code of conduct** The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy** The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Corporate Responsibility Policy** The Company outlines its commitment to the engagement of Suppliers and the process undertaken for checks for new employees.

Due diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans if necessary; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- developing a system for supply chain verification, whereby the Company evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains whereby the Company evaluates all existing suppliers.

Training

The Company's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

- what steps the Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chains.

Awareness-raising programme

As well as training staff, the Company has raised awareness of modern slavery issues by posting information on the Company's CRM system, PeopleHR.

The information explains to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Company; and
- what external help is available, for example through the Modern Slavery Helpline.