



# Modern Slavery and Human Trafficking Statement

Level 1

SOP049



# Contents

<b>1</b>	<b>Purpose and Scope</b> .....	<b>3</b>
<b>2</b>	<b>Modern Slavery and Human Trafficking Statement</b> .....	<b>3</b>
	Introduction	3
	GCI and our supply chain	3
	The control Process	4



## 1 Purpose and Scope

This statement relates to GCI Managed Services Group Limited and all subsidiaries including Freedom Communications (U.K.) Limited and Blue Chip Data Systems Limited, hereafter known as GCI.

The purpose of the statement is to communicate GCI's ongoing commitment to The Modern Slavery Act 2015 and covers the financial year of January 2019 to December 2019.

## 2 Modern Slavery and Human Trafficking Statement

### Introduction

GCI predominantly sells converged IT solutions and services to businesses. GCI has a zero-tolerance approach to both modern slavery and human trafficking in the provision of services to customers as well as whilst in direct or indirect contact with any individual.

Our expectations with regards to compliance to modern slavery and human trafficking are communicated to all employees and suppliers.

GCI is dedicated to ensuring that everything we do is ethical and lawful, and that we work in a socially and environmentally sustainable way internally and that the same is reflected across our supply chains,

### GCI and our Internal Processes

GCI's Board of Directors are committed to creating a safe, fair and inclusive working environment for all employees and contractors. We periodically review our Modern Slavery and Human Trafficking statement, along with all other internal policies, to ensure we have incorporated the latest legislation and we have the correct policies, procedures and working standards in place to ensure our staff know how to tackle any issues. GCI has a comprehensive employee handbook and supporting documents detailing the relevant policies and standards.

### GCI and our supply chain

GCI has a dedicated procurement team who manage all suppliers' relationships.

In order to deliver services to customers, GCI purchases equipment, software, and services from a wide range of suppliers. The vast majority of supplier services are purchased from world renowned brands and which are, in the main, supplied through distribution or reseller channels within the UK. We play an active role in supplier development and compliance in relation with The Modern Slavery Act and human trafficking legislation to ensure that they operate in an ethical and transparent manner.

To ensure our suppliers and contractors comply with our values, we have in place a Supplier Code of Conduct which all suppliers and contractors must adhere to. GCI conduct assessments on information provide by suppliers and contractors prior to commencing any contractual relationship with them. All supplier and contractors are required to adhere to the obligations set out in the Supplier Code of Conduct which include:

- Compliance with Legislation;
- Child Labour;
- Forced Labour;
- Freedom of Association and Right to Collective Bargaining;
- Compensation and Working Hours;
- Discrimination;
- Business Continuity Planning;
- Improper Payments and Bribery; and
- Environment.

Supplier or contractor non-compliance will result in GCI reviewing the contractual relationship with the offending party.



## The control Process

GCI conducts reviews with its suppliers and contractors to ensure they are compliant with all aspects of the Modern Slavery Act 2015. All new suppliers and contractors must follow an on-boarding process which requires clarification of their approach to ensuring compliance with this legislation.

To ensure GCI's compliance, prior to any member of staff commencing employment (either on a temporary or permanent basis), relevant checks are undertaken to ensure the individual has the legal right to work within the UK. GCI's ongoing compliance includes providing access to modern slavery training course modules to all staff at all levels to ensure recognition of any contravention of law relating to modern slavery is dealt with appropriately and efficiently.

GCI regularly reviews its own internal processes as a part of its wider compliance management obligations. Any issues identified which contravene modern slavery legislation are dealt with promptly and any corrective and/or preventative measures are put into place as necessary. A Whistleblowing policy is in place to allow for concerns to be raised anonymously regarding employees or suppliers,

## Further Steps and Continued Development

GCI are committed to improving our practices to combat slavery and human trafficking. GCI will take further steps to engage with its current & new suppliers and employees to make sure they comply with all relevant legislation and to minimise any risks.

Jim Chapelle  
Purchasing Director

13/09/19