Exponential-e Limited Slavery and Human Trafficking Statement

At Exponential-e we are committed to improving our practices to combat slavery and human trafficking. We oppose slavery and human trafficking in all its forms and make this statement to set out the steps we have taken to ensure that there is no slavery or human trafficking in our business or in our supply chains.

About us

We are an award-winning, private owned British company. We provide Cloud, SD-WAN Networks, Unified Communications services and Cyber Security services delivered over our own high capacity, secure, super-fast business-only network. We acquired Vysiion Limited, an infrastructure solutions specialist in 2020. In 2021, Xpertex became part of the Exponential-e Group. Xpertex provides professional and managed services specific to the defence industry. Together we have over 800 employees and serve over 2000 customers globally and with a supply chain of over 400 suppliers based in the UK, Europe, India and the USA.

Our business is supported by our UK based 24/7 x 356 customer service desk to deliver a non-stop computing platform for our customers. We operate and commit to eleven international standards (six of which are ISO). We are regarded as a truly world-class ICT services company by the British Standards Institute.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our supply chain comprises of suppliers who provide a range of products and services necessary for our business operations and critical to the provision of our services to our customers. These include providers of outsourced professional services, providers of recruitment services, providers of telecommunications engineering installation services, providers of IT hardware products, and providers of mobile IT infrastructure services.

Our Anti-slavery and human trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence and risk assessment

To help identify and monitor the risk of slavery and human trafficking in our supply chains we do the following:

(a) We require our suppliers to enter into contractual obligations that include the right of audit by us.

(b) Our onboarding process incorporates controls to establish a continuous obligation for suppliers to comply with the Modern Slavery Act 2015 ("Modern Slavery Act") and our anti-slavery and human trafficking policy. These controls include but not limited to the following:

- Our standard framework agreement for our suppliers adhere to measures that comply with the Modern Slavery Act.
- We set out ethical requirements to ensure that our suppliers are clear of our expectations in accordance with the requirements of the Modern Slavery Act.
- Our supply chain management software, Risk Ledger is used as part of our vetting process for tier 1 suppliers to ensure compliance with the Modern Slavery Act.

These are in line with our business ethos and help us to continue to fulfil our commitment to eleven international standards (six of which are ISO).

Our plans for 2024 with respect to our supply chain

We restate our unequivocal dedication to continue to:

(a) ensure our suppliers are aware that a copy of our Slavery and Human Trafficking Statement is available on request and also accessible via our website;

(b) regularly reinforce to our suppliers, our expectation of the same level of commitment and high standards in tackling modern slavery in their own supply chain;

(c) review evidence of our suppliers' commitment to tackling modern slavery and expect all our suppliers to hold their subcontractors to the same high standards;

(d) carry out additional vetting of our tier 1 suppliers for compliance with key supply chain legislation (including the Modern Slavery Act) using the supply chain management software, Risk Ledger; and

(e) review our supplier onboarding process to ensure our supply chain reflects our

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commitment to combatting modern slavery and human trafficking by:

(i) vetting our suppliers/sub-contractors for ethical labour practices;

(ii) keeping a record of the types of issues identified on screening suppliers/ sub-contractors;

(iii) maintaining the split of our suppliers in tiers by risk level (high, medium and low) which helps us to identify the tier of suppliers we have vetted each year; and

(iv) placing on hold our dealings with suppliers who we have identified as not compliant with our modern slavery requirements until such time as we are satisfied that such suppliers comply with our requirements.

We ensure that only those who choose to work freely are employed within our business. Each individual's human rights are important to us; we do not condone any form of discrimination, harassment or bullying.

We recognise that where workers are employed through business partners or recruitment agencies, we are not directly responsible for the employee relationship or how they manage their employees. To mitigate the risk, we consider the recruitment agents as part of our supply chain which means that they are subject to due diligence and risk assessment like any other supplier. For our employees, we provide them with an opportunity to raise any concerns or complaints. Our employees have access to the Whistle blowing Policy.

Effectiveness in combating slavery and human trafficking

We have zero tolerance to modern slavery and human trafficking. To ensure that all those in our supply chain comply with our values we monitor and enforce compliance with those values in line with our plans for 2024 set out above.

Training / Creating Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, training is provided to relevant employees via our learning management system. One of the ways we evaluate our progress is by encouraging our employees in procurement roles to receive accreditation from the Chartered Institute of Procurement & Supply.

The employees receive training on ethical purchasing. From that training, employees gain a better understanding on the nature of any risks we may face as an organisation and assist the business in implementing supportive actions where necessary.

Using the supply chain management software, Risk Ledger, we require our tier 1 suppliers to provide evidence of training their employees and meeting key performance indicators with respect to Modern Slavery Act.

Exponential-e will continue to monitor its supply chain and will reassess this statement annually to ensure that it is continuing to meet its organisational values.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 January 2023.

This statement was approved by the Board of Exponential-e Limited on 28 March 2024.

Signature:



Exponential-e Limited
28 March 2024