

Synertec Limited Modern Slavery Statement

Our Structure, Business and Supply Chains

Synertec Ltd exists to give organisations smarter, more efficient, more reliable, less costly ways to create, distribute and manage their important communications.

We are a private limited company, wholly owned by our parent company Synertec Holdings Ltd. We anticipate no changes in ownership or structure in the coming years.

As a company we employ circa 300 people across four sites in the UK. We are committed to conducting business strictly in accordance with all applicable laws and regulations in the UK, including Health and Safety at Work, Environmental, Anti-Bribery, Equality and Employment Legislation. This extends to ensuring high standards of behaviour amongst our people through our training and development programs.

We have established rigorous HR (Human Resource) processes and controls to ensure the following:

- Our people are assessed for their right to work in the UK
- Security checks are in place where necessary due to the confidential nature of our business
- Workplace equality policies and practices comply with UK Employment Legislation
- Remuneration and benefit schemes comply with all UK Employment Legislation

The Executive Management Team (EMT) have overall responsibility for ensuring that our Modern Slavery policy complies with legal and ethical obligations.

All those with whom we do business are expected to follow the highest ethical principles. Synertec engages with a limited group of core suppliers. Core suppliers are required to evidence certification, which demonstrates that their businesses and products are socially, economically, and environmentally responsible. We foster long-term business relationships with these suppliers focusing on mutuality. This focus means we are actively encouraging suppliers away from techniques that could cause them to move towards unsavoury methods within their own organisation and supply chains.

Our Policies

Synertec has policies in place governing the behaviour of our people and an expected standard of conduct. These policies include a Staff Handbook and ISMS (Information Security Management System), which all new employees receive. We encourage our people to escalate where they believe these policies warrant review.

Our approach to the wellbeing of our people facilitates employee access to rectification and remedy; we will not ignore, or treat lightly, any grievances or complaints from our people. We also have specific policies in relation to the wellbeing and expected conduct of our people, which include:

- Statement of Ethics
 - We are proud of our reputation for acting fairly and ethically in all spheres of our business
- Hybrid Working
 - The safe and secure working of all our people is facilitated through appropriate resource

- Recruitment
 - Recruitment is only undertaken with an approved list of Employment Agencies
 - All background checks required by law are completed, including right to work in the UK
- Equal Opportunities
 - We are fully committed to providing equal opportunities for all our people and eradicating discrimination within the workplace
- Whistleblowing
 - We encourage the escalation of anything unethical witnessed within our influence
- Safeguarding
 - Protecting younger individuals who pursue work experience with us
 - Protecting vulnerable employees or employees with specific needs
- Representation
 - Synertec supports any employee that is a member of a trade union or worker organisation, although we do not currently engage directly with any such organisations
- Remuneration
 - We are an accredited Real Living Wage employer

These policies and others, along with learning resource, are stored on our central network and accessible to all of our people. They are developed internally before review by the appropriate EMT member or a suitably qualified delegate, prior to being communicated companywide. All policies listed above are available upon request to any interested third party, with the most salient of these policies accessible via our website.

Due Diligence, Risk Assessment, Prevention and Mitigation

Synertec is committed to addressing the risk of modern slavery in our supply chain. We are actively engaging with our suppliers on modern slavery risks to drive improvement in this area. Modern Slavery forms part of our procurement process and any contract with suppliers; however, we aim to interact at a far deeper level than in a clause of a procurement contract.

We will keep this under constant review, and our aim is to undertake due diligence during our procurement process at every stage and regularly review all our suppliers, either on an annual basis or as and when a contract is due for renewal (whichever is sooner).

Currently, Synertec's core suppliers are required to evidence certification, which demonstrates that their businesses and products are socially, economically, and environmentally responsible. Current certifications include:

- Forest Stewardship Council
- Programme for the Endorsement of Forest Certification
- Electronic Industry Citizenship Coalition

We trade with less than 400 ad hoc suppliers, all of these are based in the UK, EU or USA and consequently should therefore only be susceptible to secondary supplier failure to comply with ethical practices. We have identified that risks associated with Modern Slavery would continue to be greatest within these secondary supply chains.

No tractable risks have been highlighted this calendar year but we will continue to review likely risks (associated with high risk countries or regions). Synertec recognises that constant vigilance is required and is committed to further action to enhance our ability in this area. Should any evidence of modern slavery be identified, our policy responding

to this would be implemented immediately, under the control of our Finance Director and a dedicated response team (consisting of the witness, line management, Finance Director and the EMT).

All managers are expected to participate in a 'Springboard' management programme developing leadership skills, and promoting a greater overarching awareness of our organisation and sphere of influence.

Effectiveness, measured against appropriate KPIs

Synertec has reviewed its key performance indicators (KPIs) in relation to the Modern Slavery Act; as a result, we have established training for all of our people on modern slavery, to ensure understanding of their responsibilities. This training encompasses:

- How to assess the risk of modern slavery and human trafficking
- How to identify signs of slavery and human trafficking
- How to escalate potential slavery or human trafficking
- What external help is available
- What we should do after reviewing suppliers
 - What steps to take if suppliers do not have a modern slavery policy

Synertec Training and Capacity Building

All Synertec employees are issued with the latest approved version of this document upon commencement of employment. Our people receive this statement in their 'starter pack', which includes all companywide policies to be read, understood and adhered to throughout their employment. This starter pack is part of our overall induction process, which consists of meetings, documentation reviews, and formal application training, all of which is recorded once completed. Our people are not permitted to commence actual live work for the business until this induction has been completed, to protect both them and the business.

Our people are required to ensure that they understand the content of the statement and the obligations it places on them in their role. They are required to escalate to their manager in the event of questions, concerns, issues or suggestions related to the statement. Our people gain an understanding of modern slavery and how to be vigilant for it in the workplace. They are made aware and encouraged to escalate should they suspect any such activity.

Updates to the Modern Slavery statement are published to all of our people, via a communication method approved by our EMT. This is usually via email; with hardcopies provided to those who do not have access to company email.

Our Human Resources, Learning and Development Department are responsible for employee training and documentation.

Our training team is managed by our Training Manager, who reports directly to the Head of HR, Learning and Development, who is a member of our EMT and reports to the Managing Director. We have a detailed and diverse training programme including, but not limited to, Modern Slavery, Information Security, Application Specific training, Escalations and Line Manager Support.

Declaration

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended March 2022. It was approved by Synertec Ltd (EMT) Executive Management Team on 11th December 2023 and signed on its behalf by: Craig Richmond, Finance Director.