Modern Slavery statement

22/05/2023

Modern Slavery is a criminal offence under the Modern Slavery Act 2015 (the Act).

At Zen Internet, it is our policy to conduct all of our business in an honest and ethical manner. We are a business that acts with integrity and we take a zero-tolerance approach to slavery, trafficking, bribery and corruption in our own organisation and in our supply chain. We are committed to acting fairly and ethically in all of our business activities, including where we partner with other organisations. We are dedicated to implementing and enforcing controls to ensure that all individuals are treated with dignity and respect.

Our commitment to running our business responsibly includes our full support for international efforts to promote ethical principles and practices related to the prevention of the exploitation and abuse associated with modern slavery and human trafficking.

We expect commitment to these principles from all organisations with which we do business and will not support or do business knowingly with organisations involved in modern slavery and human trafficking.

About Zen Internet

Established in 1995, Zen Internet has grown into a telecommunications company that provides connectivity, cloud, voice, hosting and security services to UK businesses, resellers and consumers. Our vision is connecting people to make life and business better and our long-term fundamental objectives in priority order are Happy Staff, Happy Customers and Happy Suppliers. We are based in Rochdale, Greater Manchester.

Our supply chains

The majority of our products & services are sourced from the UK, but supply chains for hardware and software extend globally. Our suppliers include telecommunications companies, service providers, hardware manufacturers, software houses and IT distributors.

We are confident that suppliers accounting for 74% of our purchasing spend as of Sep 2022 are fully committed and take proactive steps to eliminating Modern Slavery in their supply chains.

Our practices

In order to reduce the risk of modern slavery or human trafficking occurring in our supply chain we:

- Make all employees responsible for the prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad
- Make management at all levels responsible for ensuring those reporting to them understand and comply with this policy

- Communicate our policy on Anti-Slavery to suppliers and that we expect commitment to these principles from all organisations with which we do business

Awareness

To ensure a high level of understanding of the risks of modern slavery in our business and our supply chains, we include our policy and expectations for identifying and reporting modern slavery in our employee induction program and our supplier onboarding process.

Continual improvement

We regularly review our policies and procedures with the aim of contributing to progressive improvements to the lives of people in our supply chains and those that are impacted by supply chain decisions.

2017 – 2018

During this period, we changed the process for on-boarding new suppliers to request, where appropriate, confirmation that they have an Anti-Slavery and Human Trafficking Policy and informing them that we will not knowingly do business with any company that is involved with modern slavery.

2018 – 2019

We improved our company awareness of the potential for modern slavery and reinforced everyone's obligation to report such activity.

We improved our knowledge of the action taken by our existing supply base to ensure that there is no modern slavery within their own supply chains and maintain records of such evidence.

2019 – 2020

We achieved B Corp certification as a company who is using business as a force for good, reinforcing our People First values.

2020 – 2021

We registered with the Government Modern Slavery Statement Register as a step further towards best practice approach to eradicating modern slavery in our supply chain. We implemented a new system to manage supplier risk and will use that same system to evaluate our suppliers' approach to modern slavery. Where we have been made aware of modern slavery in our supply chain, we've intentionally changed our purchasing decisions to avoid these practices.

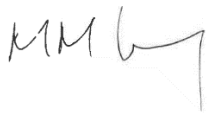
2021 – 2022

In this period, we formalised our approach to managing risks related to modern slavery in our business and supply chains and created a three-year plan that we track and monitor progress

against. We systemised our supplier on-boarding process and included our modern slavery questionnaire. This has helped us to centralise the supplier due diligence activities and will aide us in identifying any gaps in compliance that need to be addressed.

Our ethics policies were reviewed, updated and signed off by the Board of Directors. We also formalised, documented and communicated the roles and responsibilities in the business in relation to modern slavery.

Signed



Matt Kay
Director at Zen Internet Ltd
22nd May 2023