



Bell Modern Slavery Statement – April 2023 to March 2024

Introduction from Manpreet Gill, the Chief Executive Officer

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Victims of modern slavery and human trafficking can be any age, gender, nationality, and ethnicity. Bell Microsystems Limited has a zero-tolerance approach to modern slavery and human trafficking across all areas of our organisation, as well as within our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout all business operations and supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and, as part of our contracting processes with our suppliers, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This statement covers the period 1st April 2023 to 31st March 2024, in compliance with the UK's Modern Slavery Act.

This statement assesses our risk, outlines our efforts and sets commitments for the coming year.

Section 1: Organisational structure, operations and supply chains

Founded in 1995, Bell Microsystems Limited ("Bell") is a systems integrator business (trading as "Bell Integration") delivering IT hardware and IT services to businesses, and consulting and supporting organisations to develop the workspace that suits their needs by providing flexible and innovative solutions to help them move to up to date IT services and to streamline their operations.

For over 25 years Bell's market-leading technology consultation and managed services have enabled organisations to transform their IT capabilities and elevate their business productivity and cost efficiency.

Bell is head-quartered in the UK and has subsidiaries across the globe. As of 31st March 2024, Bell (and our subsidiaries) employed 765 full and part time workers globally.

We are trusted by many global Fin-Techs, Telco's and government and public sector organisations. Our customers depend on us to ensure their IT services and infrastructure are always available, scalable, sustainable, and resilient.

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Bell Integration is the trading name of Bell Microsystems Ltd. Registered in England. No. 3102360.
Registered address: Bay House, Compass Road, Cosham, Portsmouth, PO6 4RS.

Bell Microsystems is certificated by Lloyds Register (LR) to the following standards:
ISO 9001 (Quality), ISO 14001 (Environment), OHSAS 18001 (Health & Safety) and ISO 27001 (Information Security)



We have approximately 700 third party suppliers from over 20 countries. The majority our direct suppliers are registered in Europe.

We expect all of our suppliers to operate in a responsible, ethical, open and transparent way and in compliance with all applicable laws and regulations. Our global teams work closely with suppliers to communicate our standards and help them to build their capacity to provide working environments that are safe, respectful of human rights, and free of modern slavery.

Section 2: Risk Assessment and Due Diligence

Based on the nature of our business, we consider the risks of modern slavery and human trafficking to be low in our direct business operations.

However, we are aware that inherent and potential risks of modern slavery and human trafficking could be present in the following principal areas:

- Supply chains
- Recruitment through agencies
- Forms of excessive or unpaid working hours, lack of rest days
- Personal identification or passport retention
- Lack of adequate health and safety protection
- Discrimination

We recognise that we have a role to play in the global effort to eliminate modern slavery and human trafficking.

Suppliers go through an onboarding process in which they are asked to comply with a minimum set of requirements in order to be included in our supplier database. This includes financial and compliance due diligence and acceptance of Bell's Supplier Charter.

Before we trade with any UK based Supplier, we invite them to our automated Supplier Onboarding and Management platform which allows us to conduct thorough checks on all of our suppliers based in the UK. This includes a risk-based questionnaire/screening tool to assess risks such as lack of insurance, relevant compliance certificates, security policies and includes assessing modern slavery risks. Suppliers are asked to update the questionnaire and supporting evidence on an annual basis. For Suppliers based outside of the UK, Bell asks all Suppliers to accept our Supplier Charter which sets out our strict expectation that they must adhere to our various policies such as Child Labour, Sustainability and Modern Slavery.

No instances of modern slavery were identified in Bell's operations and supply chain for the period of this report. Should Bell discover that a Supplier is not acting in compliance with modern slavery legislation, we will take all steps necessary to remove such offending supplier from our supply chain. Bell Integration expect full transparency from their suppliers around any incidents of modern slavery that may occur, or that they have been involved with.

There is a range of support available when a person becomes aware that someone is at risk of or affected by modern slavery or human trafficking practices, regardless of if this occurs within Bell's supply chain and operations or in the broader community. Employees are encouraged to refer to our Whistleblowing Policy which sets out how to appropriately respond to and report suspected cases.

During the period of this report, no whistleblowing complaints were received.

Section 3: Training, Awareness and Communication

Increasing the skills and capability of our people is fundamental to our ability to conduct effective modern slavery due diligence on our supply chains.

The risk our business faces from modern slavery forms part of the induction process for all individuals that work for us. All employees are required to complete e-learning training on Modern Slavery upon induction and to refresh this training every three years.

All employees are required to familiarise themselves with our Anti-Slavery and Human Trafficking Policy.

Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an on-going basis.

Section 4: Policies, Procedures and Guidance

As well as a specific Anti-Slavery and Human Trafficking Policy, other policies and guidance support Bell's staff and supply chain to identify and proactively defend against modern slavery.

C88 Whistleblowing Policy	This policy enables employees to raise concerns in the knowledge it will be taken seriously and investigated as appropriate, and confidentiality will be respected.
HR93 Employee Handbook	The Handbook provides signposts to the relevant policies for ease of access.
C94 Bell Integration Supplier Charter	We require our suppliers to comply with the principles set out in our Supplier Charter. Fundamental to the Charter is an expectation that all suppliers operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced and procured or where services are performed. Suppliers are required to ensure that there is no modern slavery in their supply chains and operations.

Contractual terms	Our terms include provisions specifically requiring compliance with UK modern slavery laws and those foreign modern slavery laws that apply in the location(s) in which applicable parties operate, and require suppliers to ensure that any of their contracts with sub-contractors require compliance with such laws.
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Section 5: Measuring effectiveness of steps being taken and KPIs

In March 2024, our performance on environmental, social and governance matters was recognised by the renewal of our EcoVadis assessment (an independent sustainability ratings agency providing transparency into our organisations’ sustainability practices) receiving a Bronze rating.

Since its launch, 100% of applicable suppliers have accepted the terms of Bell’s Supplier Charter. Our Supplier Charter requires our suppliers to treat people with dignity and respect. All suppliers commit to:

- comply with our Anti-Slavery and Human Trafficking Policy;
- not engage in any form of human trafficking, procure commercial sex acts or use forced labour;
- ensure that workers have freedom of movement and are free to leave their employment after reasonable notice: and
- return immediately any workers’ government-issued identification, passports or work permits once they have confirmed workers’ identities or working rights (to the extent that is required).

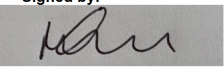
All suppliers commit not to:

- use misleading or fraudulent recruiting practices,
- use recruiters that do not comply with local labour laws in the country where the recruiting takes place,
- expect workers to pay for a job,
- provide housing that does not meet the standards of the country where work is performed, or
- fail to provide an employment contract or recruitment agreement if required to do so by law.

In addition, we may require suppliers to demonstrate that they have relevant policies and procedures in place.

Bell seeks to continuously improve its own purchasing practices. We understand that we can have a profound impact on the conditions of workers in supply chains through our own purchasing practices. Aggressive pricing, short lead times and late payments are just a few examples of purchasing practices that can unintentionally cause modern slavery risks.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. This statement has been approved by the board of directors of Bell Microsystems Limited and its relevant subsidiaries on 23rd September 2024.

Signed by:

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Manpreet Gill

Director and CEO