Chess Limited

Modern Slavery Policy Statement 2022

1 What is slavery?

1.1 The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person.
Servitude	The obligation to provide services is imposed by the use of coercion.
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation.

1.2 This policy covers all four activities.

2 How is it relevant to us?

2.1 Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.

2.2 At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.

2.3 The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

2.4 With this in mind, we need to pay particularly close attention to:

2.4.1 our supply chain

2.4.2 any outsourced activities, particularly to jurisdictions that may not have adequate safeguards

2.4.3 cleaning and catering suppliers

2.4.4 corporate hospitality

3 Responsibilities

3.1 The business, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

3.2 Everyone must observe this policy and be aware that turning a blind eye is unacceptable and simply not an option.

3.3 The Business

3.3.1 Chess Limited is a communications company based in Alderley Edge, Cheshire with additional hubs available on an ad hoc basis at various locations across the UK ("the Chess Group"). The Chess Group provides fixed line, mobile, broadband, cybersecurity and other associated data and telecommunication services to its customers.

The Group has over 360 employees and has a global annual turnover of £84,400,000

3.3.2 Chess Limited have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the MSA 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will 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 policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, agents, contractors, external consultants, third-party representatives and business partners.

3.3.3 As such we will:

(a) maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation

(b) check our supply chains (see 4.1)

(c) lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us

(d) we have in place systems to:

- identify and assess potential risk areas in our supply chains
- mitigate the risk of slavery and human trafficking occurring in our supply chains
- monitor potential risk areas in our supply chains
- protect whistle blowers

(e) ensure we have in place an open and transparent grievance process for all staff

(f) seek to raise awareness so that our colleagues know what we are doing to promote their welfare

(g) take our responsibilities to our employees and our clients seriously

3.4 The Board

The Board of Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Chief Financial Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3.5 Managers

3.5.1 Managers will:

(a) listen and be approachable to colleagues

(b) respond appropriately if they are told something that might indicate a colleague is in an exploitative situation

(c) remain alert to indicators of slavery

(d) use their experience and professional judgement to gauge situations

3.6 Colleagues

3.6.1 We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

(a) keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, you should report that to a senior manager

(b) tell us if you think there is more we can do to prevent people from being exploited

4 Our procedures

4.1 Supply chains

4.1.1 We thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.

4.1.2 We tell the companies we do business with that we are not prepared to accept any form of exploitation.

4.1.3 All our supplier contracts contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.

4.1.4 Our supply chains include: -

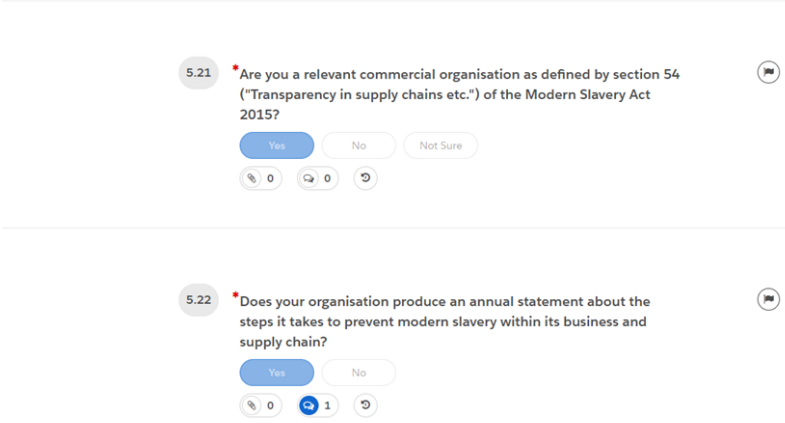
- BT EE & OpenReach
- Gamma Telecom
- Talk Talk Broadband
- Sophos

4.1.5 To ensure all those in our supply chain and contractors comply with our values we have in place a robust supply chain compliance programme. This consists of: -

Our Supplier Management process is operated and maintained by our central Commercial Team, who ensure that we only select suppliers who meet certain standards and can demonstrate they have the necessary accreditations, certificates and policies including the . Modern Slavery Statement where applicable Each Supplier is evaluated by the Commercial and Compliance Team against minimum thresholds and either approved or rejected within our system. A formal contract detailing deliverables and conditions is then agreed and signed between both parties and stored within our OneTrust system.

The process consists of the following:

1. RFP
2. Evaluation matrix
3. Once selected from RFP we generate a vendor assessment on OneTrust
4. Assign assessment to vendor (see below screenshot from OneTrust)



5. Reviewed by Commercial for completeness
6. Compliance review to ensure compliant and all due diligence is carried out

7. Once approved by Compliance, Commercial team tasks to other departments i.e. Legal for contracts
8. Pre board approval is carried out
9. Board approval

Periodic reviews (at a minimum every 6 months) are performed on Suppliers to check their performance, and annual reviews to maintain up to date records of relevant policies / insurance, etc.

4.2 Recruitment

4.2.1 Using agencies

(a) We only use reputable recruitment agencies.

(b) To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:

(i) conducting background checks

(ii) investigating reputation

(iii) ensuring the people it provides have the appropriate paperwork (eg work visas)

(iv) ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying

(c) We keep agents on the list under regular review, at least every 3 years.

4.2.2 General recruitment

(a) We always ensure all of our people have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

(b) We always ensure our people are legally able to work in the UK.

(c) We check the names and addresses of our people (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

(d) We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

5 Identifying slavery

5.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

5.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim.

5.2.1 The person is not in possession of their own passport, identification or travel documents.

5.2.2 The person is acting as though they are being instructed or coached by someone else.

5.2.3 They allow others to speak for them when spoken to directly.

5.2.4 They are dropped off and collected from work.

5.2.5 The person is withdrawn or they appear frightened.

5.2.6 The person does not seem to be able to contact friends or family freely.

5.2.7 The person has limited social interaction or contact with people outside their immediate environment.

5.3 This list is not exhaustive.

5.4 Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

5.5 If you have a suspicion, report it.

6 Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training during the induction period and relevant compulsory modules on our LMS (Learning Management System). We also require our business partners to provide training to their staff and suppliers and providers.

7 Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Measuring changes in awareness of modern slavery among key employees – (not just measuring how many people have received training)
- Evidence that findings from ongoing monitoring and review have fed into and influenced business practices
- Details of audit, inspection and review practices (e.g. which third-party auditors are used, what the process is for conducting an audit, what findings are gathered, how the data is then used, etc.)

8 Reporting slavery

8.1 Talking to someone about your concerns may stop someone else from being exploited or abused.

8.2 If you think that someone is in immediate danger, dial 999.

8.3 Otherwise, you should discuss your concerns with Anne Binnie, People Support Director, by mobile 07809 665814, email annebinnie@chessict.co.uk who will decide a course of action and provide any further advice.

8.4 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with Anne Binnie before taking any further action.

9 Monitoring our procedures

9.1 We will review our Anti-slavery policy annually and will update our website accordingly providing additional information and/or training as necessary on any changes we make.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Chess Group's slavery and human trafficking statement for the financial year ending 30th April 2022.

Signed:



Mark Lightfoot, Chief Financial Officer

Date: 28th April 2022