

ANTI-SLAVERY STATEMENT

(2023-2024)



This statement is made regarding the Modern Slavery Act 2015 which requires employers to be transparent about their efforts to end slavery and human trafficking in their supply chain. Boston Limited continues to see high ethical standards in the conduct of our business activities and within our supply chain.

Modern slavery encompasses slavery, servitude, human trafficking, and forced labour. Boston Limited has a zero-tolerance approach to any form of modern slavery. This includes making sure that our company practices are compliant with human rights and employment legislation in all areas that our business operates.

We are committed to end modern slavery and are taking the appropriate steps to make sure that everyone who works for Boston Limited benefits from a working environment in which their fundamental human rights are respected and anyone that we do business with also upholds these principles.

The information in this statement details policies, statements, and actions we have taken to make sure that slavery and human trafficking are not taking place in our supply chains or any part of our own business. At Boston Limited, work is undertaken by our Human Resources and Compliance team to assess compliance with our labour, ethics and human rights management processes, identifying the adequacy of current controls, and recommending any applicable corrective actions required. Our Senior Management team has the responsibility of reviewing the effectiveness of actions taken.

OUR BUSINESS

Since 1992 we have continued to lead the way in providing the latest high-performance power optimized technologies into the ISP, HPC, Enterprise and Broadcast marketplace with our range of server, storage, workstation, and clustered solutions. We do this by combining our talent, creativity, technology, and innovation with sector knowledge and proven skills and expertise underpinned by our scaled operational platforms.

Our headquarters are located in the UK with other branches and related parties around the world, including Germany, India, France, Australia, South Africa, and the US. Having a presence worldwide highlights to us the importance of and our obligations towards prioritising and protecting human rights.

OUR POLICIES

Boston Limited has policies and statements in place to support us in ensuring modern slavery is not taking place in our supply chains or business:

- Equal Opportunity Policy
- Modern Slavery Policy
- Standards of Business Conduct Statement
- Employee Handbook
- Peoples Policy
- Corporate and Social Responsibility Policy
- Procurement Policy
- Working Time Policy
- Ethics, Equality and Diversity Policy
- Disabled Workers Policy
- Whistle-Blowing Policy

We continue to review our policies, practices and how we identify any risks of modern slavery and other human rights as part of our continued commitment to ethical and responsible business practices. Over the last 12 months, we have introduced additional policies to monitor our procedures effectively. We have introduced the Peoples Policy and Whistle-Blowing Policy, in addition to updating our Procurement Policy and purchasing practices.

From a training perspective, we have implemented a company-wide training platform which incorporates training across Modern Slavery Awareness and Human Trafficking to make sure all our employees know what to look out for and how to raise concerns. Internally, we review working hours monthly and have developed an overtime report that we monitor in-line with Working Time Regulations 1998. We have conducted a full right to work audit, which we will continue to do annually to ensure that all our employees have current documentation in place. We review salaries annually in January for all employees to ensure compliance with National Minimum Wage Act 1998 and the annual increase.

Over the next 12 months, we plan to implement a more in-depth audit of our suppliers Modern Slavery statements and compare these against UK Government Guidance and their previous statements to check for compliance and continuous improvement across our supply chain. Any high-risk Suppliers will be supported to make improvements. We will also be expanding our risk assessments across the supply chain to identify high risk suppliers and support them in identifying areas for improvement. We will be adding key performance indicators and future targets to help us track progression towards eliminating modern slavery.

OUR RISKS

As an international business with suppliers and customers worldwide, we recognise that the highest risk to our business regarding modern slavery lies within countries in which we or our suppliers operate where human rights are less protected. We have identified the countries at high risk of forced labour and the vulnerable groups of workers within our supply chain which may include the use of migrant workers and students.

We believe that the actions we take to regulate our supply chain help to offset and negate this risk. We have conducted a risk analysis to identify areas of high risk and have applied controls to mitigate those risks associated with our business activities. This has allowed us confidence in our continued compliance with relevant legislation including the Modern Slavery Act 2015.

OUR SUPPLY CHAIN

Boston Limited is committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our supply chain is made up of long-term business relationships with products and services that we use in our business; employees, partners, suppliers, and contractors. We continue to work with a diverse set of suppliers who are financially stable and ethically responsible. As part of our initiative to identify and mitigate risk, our procurement team strives to continuously improve and support our business to have an effective sight of our supply chain. We will assess the suitability of businesses within our supply chain, ensuring checks are conducted before approving companies onto our approved supplier list, this includes checking supplier modern slavery statements and their compliance to the Act.

We conduct due diligence on all suppliers and contractors by continually monitoring our supply chain. We ensure that we only work with businesses, who treat their obligations towards modern slavery with the same importance we do. Where suppliers and contractors do not meet the standard required, we would ask them to demonstrate the action they are taking to improve and then subsequently terminate the business relationship if the required improvement is not forthcoming. Where a supplier or contractor is found to have had any involvement in modern slavery, we would immediately end the business relationship and take further action if necessary. Measures we have taken provide us with the reassurance that our suppliers and contractors have the same level of commitment to ending slavery and human trafficking as we do.

OUR EMPLOYEES

All of our employees worldwide share our commitment to eradicating modern slavery. We acknowledge that modern slavery poses a risk to all areas of our business. We highlight the crucial role our employees play in helping us to ensure that modern slavery is not taking place by placing posters throughout the business to raise awareness and to

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inform employees about the issue.

We now conduct training for all employees and more specific training for our Management and Procurement teams so that they understand the risks associated with human trafficking and forced labour in supply chains and how to effectively carry out our policies and standards. Training is provided on what to do if they suspect that it is taking place within our supply chain. All of our employees are encouraged to identify and report any potential breaches of our anti-slavery stance.

Our Employee Handbook and Peoples Policy details our commitments to labour and working rights. Boston Limited provides fair working conditions for all our employees including terms and conditions of employment, pay, working hours, health and safety, resting time and holiday entitlements. Forced or compulsory labour is prohibited, and coercion at work is not tolerated within our business. All employees are required to read and abide by our Employee Handbook, which details how employees can raise any uncertainties. Slavery and human trafficking are considered ethical concerns and employees are encouraged to express concerns openly and in confidence at any time.

OUR COMMITMENT

This statement fulfils the requirements of Section 54 (Transparency in supply chains) of the Modern Slavery Act 2015 and covers the period of March 2023-February 2024. This statement has been established and implemented with the approval of the Managing Director as a sign of the Company's commitment at the highest level.

Manoj Nayee
Managing Director
Boston Limited