

# boxxe Modern Slavery Statement

## Organisational structure and supply chains

Boxxe Limited (“**boxxe**”) is a privately owned entity incorporated in the UK. We provide corporate and public sector organisations with hardware, software, and services across a range of technologies including cloud, datacentre, workplace and security. Our customers, who are based predominantly in the UK, trust our in-house teams to deliver consultancy and managed services which support and enhance a broad range of industry leading and innovative technology partners. We collaborate with a range of specialised external service partners to support and enhance the capabilities of our internal teams. Whilst the boxxe group has offices across the UK, our approximately 350 people are equipped to work anywhere in the UK.

## Introduction to the Modern Slavery Act

The Modern Slavery Act 2015 (the “**Act**”) requires each business in the UK with an annual turnover of over £36 million to publish a transparency statement which sets out the steps they have taken to ensure there is no modern slavery in their supply chain or within their own business.

Our commitment, outlined in this policy statement, is made pursuant to the Act.

## Our policy on modern slavery and human trafficking

We have an absolute zero tolerance policy to modern slavery. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This policy statement and our company policies more broadly, reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place within our business or supply chains.

We recognise that modern slavery is a serious violation of human rights and includes a range of exploitative practices including, but not limited to:

- **Forced or compulsory labour:** Where individuals are made to work against their will under the threat of punishment, violence, or intimidation.
- **Human trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, coercion, deception, or abuse of power for the purpose of exploitation.
- **Debt bondage:** When a person is forced to work to repay a debt and is unable to leave due to unfair terms or manipulation.
- **Descent-based slavery:** Where individuals are born into slavery because their ancestors were enslaved, and they are treated as property by others.
- **Being owned or controlled by another:** Through mental or physical abuse, threats, or the misuse of power.
- **Being dehumanised:** Treated as a commodity, bought or sold, or denied personal autonomy.
- **Severe restrictions on freedom:** Including being physically restrained or having one's freedom of movement significantly limited.

These practices may be hidden or systemic, and we are committed to identifying, preventing, and addressing all forms of modern slavery in our operations and supply chains.

## Commitment

We acknowledge our responsibilities under the Act, and we are committed to preventing slavery and human trafficking within our businesses and our supply chains. We understand that this requires an ongoing review of our internal practices and continual due diligence of our supply chains.

As part of our zero-tolerance policy, we will not enter into business, and will discontinue any current business, with any other organisation which knowingly supports or is found to involve itself in slavery, servitude or forced or compulsory labour.

This is made clear to our suppliers at the point of onboarding and is also required from our suppliers themselves in their own supply chains, as set out in our [Supplier Code of Conduct](#). boxxe suppliers are encouraged to refer to the [ETI Base Code](#), which outlines international labour standards and ethical labour practices.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. We adhere to all relevant employment legislation in the United Kingdom. boxxe is an accredited Real Living Wage employer, certified by the Living Wage Foundation. View the full list of accredited Real Living Wage employers here: <https://www.livingwage.org.uk/accredited-living-wage-employers>. In addition, all London employees and contractors are paid the London Living Wage.

As part of our commitment to ethical business practices, we also adhere to the principles of the Fair Payment Code. We are dedicated to paying our suppliers on time and in accordance with agreed terms, ensuring that they are not subjected to financial pressures that could contribute to exploitative or unethical practices, including modern slavery. By upholding the Fair Payment Code, we aim to foster fair and transparent relationships with our suppliers, enabling them to operate with financial stability and integrity, which helps reduce the risks of modern slavery within our supply chains.

Further, boxxe actively supports modern slavery charities in a range of ways, including running annual awareness sessions for employees to spot the signs of modern slavery as well as offering volunteering opportunities to boxxe employees such as running digital skills sessions and assisting with gardening at community projects. boxxe has committed to participate in fundraising campaigns and to make an annual donation to Medaille Trust, a charity that provides countrywide support to survivors of modern slavery.

Finally, we have introduced our anonymous whistleblowing reporting [portal](#), through which any employees, customers and suppliers are able to report any modern slavery related concerns.

### **Our due diligence processes**

Our supplier due diligence processes are designed to:

- (a) establish and assess areas of potential risk in our business and supply chains. This is outlined in our “Supplier Management Procedure Document”;
- (b) monitor potential risk areas in our business and supply chains;
- (c) reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- (d) provide adequate protection for whistleblowers.

To ensure that this policy statement is adhered to, we implement the following processes:

1. boxxe has a strict supplier selection process and an ongoing review process, carried out by its dedicated Supplier Management team.
2. We assess each of our suppliers to understand the steps, measures, and practices they have in place to prevent exploitative practices associated with modern slavery and human trafficking. As a reseller of goods and services - not a manufacturer - we rely on our suppliers to conduct self-audits and monitor their supply chains, and we require evidence of these efforts during onboarding.
3. During the onboarding process, we engage with all our suppliers to convey the contents of this policy statement and the [Supplier Code of Conduct](#) . We ask for confirmation by way of a signed statement from each onboarded supplier that they:  
(a) have read and understood our policy statement and Supplier Code of Conduct; and  
(b) will adhere to it.
4. To support our suppliers in strengthening their approach, we may provide further guidance through the Supplier Management Procedure Document, such as the [Dhaka Principles for Migration with Dignity Implementation Guide](#) and Verité’s [Fair](#)

[Hiring Toolkit for Suppliers – Step 1](#), which offer practical tools for improving recruitment practices, developing robust codes of conduct, and mitigating the risk of forced labour.

5. We include contractual provisions into our supply contracts where appropriate to confirm that our suppliers adhere to the Act and that they accept our policy statement.
6. We make it mandatory to discontinue business with any supplier found to have been involved in modern slavery (upon us becoming aware of such).
7. We undertake the Modern Slavery Assessment Tool ([MSAT](#)) (a free modern slavery risk identification and management tool for public bodies to use with their suppliers) on an annual basis to ensure we are consistently striving to make improvements on our practices and procedures.

To facilitate these processes, we maintain an accurate supplier list including key contact details. We also encourage the use of our whistleblowing policy to report any concerns regarding modern slavery. We will investigate any complaints thoroughly and provide protection to the whistleblower.

boxxe evaluates its targeted suppliers to ensure they maintain high standards. The criteria include:

- Operating in a 'high risk' country per the Walk Free guidelines ([World | The Global Slavery Index](#))
- Operating in a 'high risk' industry per the Walk Free guidelines
- Annual spend and purchase order volumes.

## [Training](#)

We are committed to educating our employees on recognising the risks of modern slavery and human trafficking within our business and supply chains. All employees are required to read this policy statement and confirm their understanding, agreeing to comply with its terms to support the identification and prevention of modern slavery. The policy statement is communicated internally to all employees and is made available on boxxe's website to raise awareness after publication each year.

As part of their induction, all new employees receive training on modern slavery. In addition, all employees are required to complete mandatory modern slavery training as part of our annual compliance training programme. Further, teams within the business which are more likely to encounter or spot the signs of modern slavery undergo enhanced annual training to ensure they are fully informed about the requirements of this policy statement. This specialised training equips them with the knowledge and tools to effectively recognise modern slavery within our supply chains.

Furthermore, we partner with [Medaille Trust](#), a registered charity, to enhance our employees' understanding of modern slavery. Through this collaboration, we offer webinars that provide further insights into the risks and impacts of modern slavery, ensuring that our staff remain informed and vigilant.

## Our effectiveness in combating slavery and human trafficking

We monitor our internal compliance with this policy statement by tracking:

1. Which of our targeted suppliers have read and agreed to adhere to our policy statement;
2. Which of our targeted suppliers have implemented their own policies and procedures with prohibitions against modern slavery; and
3. Which of our targeted suppliers place obligations on their own employees to comply with their modern slavery policies.

Where our suppliers do not yet have modern slavery policies and procedures in place, where appropriate we will ask for confirmation as to the likely timescale for their introduction and make an assessment as to whether they are a suitable supplier for boxxe to engage with.

Where we have identified a potential risk (for example, a breach within a supplier's own supply chain), we will ask the supplier to provide further evidence in order to make an assessment as to the viability of working with the supplier. If the risk can be mitigated or resolved, boxxe documents this and will continue to work the supplier (if necessary, subject to certain conditions or caveats around improved procurement practices and/or industry collaboration). However, if the risk cannot be mitigated or resolved, we enforce a strict code of compliance so a failure to comply with this policy will result in the termination of our contract with the supplier.

## Service Level Agreements

In order to track our own effectiveness and understanding as a business in combating and preventing modern slavery from occurring at boxxe or in our supply chains, we track the following metrics to assess our effectiveness:

- (a) *Modern Slavery incidents*: We track the number of modern slavery incidents that have been raised during the year, either directly raised internally or by a customer or supplier, or anonymously via our whistleblowing platform, [Your Voice](#).
- (b) *Assess the effectiveness of our training*: We track completion rates of our compulsory modern slavery training course as well as our enhanced ethical supply chain training for individuals who are positioned within boxxe to spot the signs of modern slavery more readily.
- (c) *Commitment to Modern Slavery social value targets*: As our customers share our commitment to the eradication of modern slavery, we track boxxe's social value commitments in our successful bids. Where they prioritise modern slavery, we can track what boxxe has delivered on these commitments during the year over its active contracts.

In addition, although these are not tracked as metrics, we also use these as tools to assess our performance:

- (d) *Internal Review of our policies and procedures*: We regularly review our policies and procedures to ensure they are in line with regulatory requirements and best practice. This also includes reviewing our due diligence and ongoing monitoring procedures in relation to our suppliers.
- (e) *External scrutiny*: Our modern slavery policies and procedures also come under external scrutiny and are assessed by our customers through bids and tenders' processes and periodically through customer audit assessments, which set out to verify and understand our position around modern slavery.

### Responsibility for our policy

boxxe's Board of Directors are ultimately responsible for compliance with this policy, and the Board of Directors are advised by the internal Legal team. Any queries, questions or concerns regarding modern slavery can be addressed to both the Legal team and the Board of Directors. The Legal team, ESG team and Commercial Operations team undertake an annual review of our obligations towards eradicating modern slavery within our organisation and supply chains.

### Risk Assessment and Management

boxxe has a risk-based methodology in place to ensure its suppliers comply with the Act. Given the nature and locations of our business, we consider ourselves to be at low risk of the potential for slavery or human trafficking. We also believe that our business model and strategy is unlikely to create material risks of slavery and human trafficking. We have a number of procedures in place which we consider to be effective to prevent modern slavery from occurring in our business or supply chains.

### Approval

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 2023 and is approved by the Board of Directors of Boxxe Limited.

Signed on behalf of Boxxe Limited by



Phil Doye, CEO

June 2025