

Modern Slavery and Human Trafficking Policy

V2.0

Date 20th January 2024

Classification - Unrestricted



COMMSWORLD

commsworld.com

ORGANISATION

This statement applies to Commsworld Ltd (referred to in this statement as 'the Organisation') and relates to financial year ending 31st December 2024.

OVERVIEW

"Modern slavery is a heinous crime and tackling it is a top priority for this government and for me personally as Home Secretary.

Businesses have a vital role to play. Modern slavery is a brutal way of maximising profits; by producing goods and services at ever lower costs with scant regard for the terrible impact this has on individuals. But my message is clear. Businesses must not be knowingly or unknowingly complicit in this horrendous and sickening crime". – Rt Hon Amber Rudd MP, Home Secretary

There are 17 million victims of modern slavery globally. Commsworld does not tolerate slavery or human trafficking in our business or supply chains. We are committed to continually improving our policies and practices to play our part in tackling this awful crime. By acting, our company contributes to ending this abuse.

This policy sets out the actions that Commsworld have taken to get assurance that slavery and human trafficking are not taking place in its supply chains or any part of its business, and the steps that have been taken to mitigate this risk.

DEFINITIONS

Commsworld considers that modern slavery encompasses:

- Human trafficking.
- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- Being dehumanised, treated as a commodity or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

Commsworld acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Commsworld understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Commsworld does not enter business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Commsworld in the pursuance of the provision of our own services is obtained by means of slavery or human trafficking. Commsworld strictly adheres to the standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Our statement is being registered on the GOV UK Modern Slavery Statement Registry <https://modern-slavery-statement-registry.service.gov.uk/> and is available on our own web site at <https://www.commsworld.com/>

SUPPLY CHAINS

In order to fulfil our activities, the Commsworld main supply chains include those related to the supply of underpinning telecommunication services in the UK such as data network carriers including but not limited to Openreach, TalkTalk Business, Virgin and CityFibre in addition to network infrastructure construction businesses and network switching and routing equipment providers.

POTENTIAL EXPOSURE

In general, Commsworld considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, we have taken steps to ensure that such practices do not take place in our business nor the business of any organisation that supplies goods and/or services to it.

STEPS TAKEN TO PREVENT MODERN SLAVERY

Commsworld carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in our organisation or supply chains, including conducting a review of the controls of our suppliers.

Commsworld has not, to our knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.


In accordance with section 54(4) of the Modern Slavery Act 2015, Commsworld has taken the following steps to ensure that modern slavery is not taking place:

- ▶ **Risk Assessment:** Regularly assessing and addressing modern slavery risks within our operations and supply chain by evaluating our supply chain for goods or services purchased by your company could potentially involve slave labour, either fully or partially and focus on these businesses.
- ▶ **Due Diligence:** We continuously review our key suppliers to ensure their commitment and adherence to our requirements in relation to Modern Slavery and Human Trafficking. Formal questionnaires are sent to our key suppliers to ensure this commitment continues annually. No new key suppliers are on-boarded without completing our questionnaire and a review of that questionnaire had been undertaken by our compliance manager.
- ▶ **Training:** provide annual and on-boarding awareness training of our staff to ensure that they understand our position on Modern Slavery and Human Trafficking and are able to recognise potential risks.
- ▶ **Contractual:** Implementing a break-clause within our general terms and conditions to ensure any supplier found to be involved in Modern Slavery or Human Trafficking will have its contract terminated with us.

- ▶ **Reporting:** Implemented a reporting mechanism for potential incidents.

Version Control and Approval

Version	Date Issued	Brief Summary of Change	Owner's Name
V1.0	3rd June 2024	Commsworld have included a statement on Modern Slavery in our Ethics Policy since 2014. This is an expanded, standalone policy to reflect current views, legislation and our position on Modern Slavery and Human Trafficking.	John McDermott
V2.0	20/01/2024	Revised and updated policy for FY ending 31 st December 2024. Glasgow office removed from contact details.	John McDermott

Author	John McDermott – Chief Delivery Officer
Approved by:	Bruce Strang – Commsworld Chief Operating Officer
Signed:	
Date:	20/01/2024

Review and consultation process:	Annually reviewed.
Responsibility for Implementation & Training:	Day to Day responsibility for implementation and training rests with Commsworld's Compliance Manager and HR Director.
Distribution methods:	This Policy has been distributed to all Commsworld staff via email and is stored in its most current version on the Corporate Intranet.

Contact

Edinburgh

Commsworld Ltd
Queen Anne Drive
Newbridge
Edinburgh EH28 8LH
T 0330 1210000

