Modern Slavery Statement (2023)

PURPOSE

The Modern Slavery Act 2015 came in to force on the 29th of October 2015, with the aim of reducing and preventing modern slavery and human trafficking. All commercial organisations operating in the UK, with a turnover of £36 million or greater are required to publish, or make available, a Modern Slavery and Human Trafficking Statement. Every organisation's Modern Slavery and Human Trafficking Statement must be reviewed, updated, and re-published each financial year.

This statement sets out GBM's actions to understand all potential modern slavery risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

SCOPE

This statement relates to actions and activities during the financial year. As part of it's operations to provide ICT hardware and services to consumers, businesses, educational establishments, charities, and public sector bodies, GBM recognises that it has a responsibility to take a robust approach to preventing modern slavery and human trafficking. GBM is absolutely committed to preventing slavery and human trafficking in all of its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

ORGANISATIONAL STRUCTURE

This statement covers GBM Digital Technologies Group Limited, GBM Digital Technologies Holdings Limited, GBM Digital Technologies Limited, and Kingsfield Computer Products Limited.

GBM Digital Technologies Limited (company reg: 02719704) is a wholly owned subsidiary of GBM Digital Technologies Holdings Limited (company reg: 07355195), which in turn is a subsidiary of GBM Digital Technologies Group Limited (company reg: 12470566).

Sync is a trading name of GBM Digital Technologies Limited.

Kingsfield Computer Products Limited (company reg: 3357539) is also a wholly owned subsidiary of GBM Digital Technologies Group Limited (company reg: 12470566).

GBM is an ICT hardware and software reseller, and services provider. GBM provides technology-oriented products and services to consumers, businesses, educational establishments, charities, and public sector bodies.

GBM operate in the UK only, and supply within the UK and EU only.

SUPPLY CHAINS

Our supply chains are non-complex, and typically fall in to one of two models:

- Purchasing directly from the manufacturer

- Purchasing from a distributor, who is authorised to distribute goods and services on behalf of the manufacturer

RESPONSIBILITY

Policies: Board of Directors

Risk Assessments: Procurement and Directors regarding supply, HR / Operations and Directors regarding employment

Investigations & Due Diligence: Board of Directors

Training: Board of Directors and Operations team

RELEVANT POLICIES

GBM operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing Policy – GBM encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of GBM. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. GBM's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Employee Code of Conduct – GBM's code makes clear to employees the actions and behaviour expected of them when representing GBM. GBM strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Supplier Code of Conduct – GBM has continued to enhance its Supplier Code of Conduct, which includes enhancements to its supplier vetting procedures - giving GBM greater visibility to those suppliers relevant under the Modern Slavery Act, and their compliance with the act.

The code of conduct outlines GBM's commitment to ensuring that its suppliers adhere to the highest standard of ethics. Suppliers are required to certify and/or demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Under this commitment, GBM may work with suppliers as necessary to ensure that they meet the standards of the code and improve their worker's working conditions. Serious violations of the Supplier Code of Conduct, however may lead to sanctions against the supplier, and ultimately, termination of the business relationship.

Further works on policy development and evolution will continue through 2023-24.

RECRUITMENT AND HR POLICY

GBM has continued in its efforts to create a more robust recruitment and HR system, including:

• undertaking an activity to centralise recruitment to one reputable agency, who have shared full detail of their practices and processes, by way of a pre-selection review (selected from multiple agencies that were reviewed as part of this process)

• enhanced procedures to ensure that GBM only utilises reputable employment agencies to source labour, and verifies the practices of any new agency it is using before accepting workers from them

• working to enhance its processes for 'eligibility to work in the UK' (Right to Work) checks for all employees to safeguard against human trafficking or individuals being forced to work against their will

Inline with this commitment, GBM has worked through 2021-23 to fully digitised

its HR processes, and enhance its 'Right to Work' checks for employees. The digitisation of HR records also allows GBM to more easily audit its records relating to all aspects of its employees, including employment contracts and Right to Work. We will continue to develop our recruitment policy through 2023-24.

DUE DILIGENCE

Over the last year, GBM continued its work in building out a processes to undertake enhanced levels of due diligence when considering taking on new suppliers, and regularly review its existing suppliers, including:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking

- evaluating the modern slavery and human trafficking risks of each new supplier

- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping

- conducting supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where general risks are identified; and

- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

GBM will continue working towards a more robust system, with a view to better assessing and mitigating risk in the supply chain.

ASSESSING RISK

GBM is committed to enhancing existing measures, and introducing new / enhancing existing measures to assess and manage the risk of activity carried out across its supply chain. This forms part of our supply chain vetting process, and will take key risk areas in to account, including those associated with:

- Country

- Sector

- Transactions

- Business partnerships

Inline with its commitments to enhancing its practices, and understanding of risk, GBM has made funding available to its staff for Risk Management training, operating against the principals of ISO 31000 (Enterprise Risk Management). GBM will continue working towards a more robust system.

PERFORMANCE INDICATORS

GBM has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, GBM have:

- made progress in the development of its systems to better handle supplier vetting

- made changes to its recruitment process, utilising a centralised, reputable, and accessible partner for recruitment

- made changes to its mandatory training programmes to include a dedicated Modern Slavery awareness course

We will monitor the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not

taking place within our business or supply chain. The key metric being that no reports are received from employees, our suppliers, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

TRAINING

We are committed to ensuring that our employees are able to recognise, help prevent, and report acts (and suspected acts) of Modern slavery.

Our policies, (i.e. Whistleblowing, and Employee Code of Conduct) are made available to all employees via the staff handbook.

We have also utilised resources provided by the Home Office, and the 'Anti-Slavery Toolkit' provided by Nottingham University, to create a mandatory training programme for all staff, with an aim to both:

• raise awareness, and educate our employees about Modern Slavery and Human Trafficking, and

• inform staff about routes and mechanisms for prevention and reporting

BOARD APPROVAL

This statement has been approved by GBM's board of directors, who will review and update it annually.