



CORP POL-0011

Modern Anti-Slavery Policy

March 2023

Version 3.0



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1. INTRODUCTION

Modern slavery and human trafficking are industries that profit from the exploitation of people. These industries are fueled by a high-reward/low-risk dynamic and by the economic principles of supply and demand. They are the only industries in which the supply and demand are the same thing: human beings. Refer to [Appendix A: Definitions Table](#) for some examples of modern slavery and human trafficking.

1.1 Purpose

The purpose of this Policy is to increase Company awareness, provide documented training, and incorporate instruction on how to report known or suspected instances of slavery, human trafficking, unlawful servitude, forced or compulsory labor, and/or any other related activities that are unlawful in nature. A secondary purpose is for our Company to overtly offer our statement on modern anti-slavery and human trafficking as a means to identify, prevent, and mitigate this in its operations and supply chains. Furthermore, this Policy is meant to codify the Company's actions in compliance with [UK requirements](#).

1.2 Audience

This document is intended for all Company Personnel, affiliates, and agents.

1.3 Compliance with Laws and Regulations

The Company and Personnel must obey all applicable laws and regulations that affect the Company's business. Personnel are responsible for having a general understanding of laws governing areas of responsibility. Personnel have an obligation to seek out guidance prior to taking an action if there is any doubt concerning the application of a law or regulation. Acceptable outlets to contact are as follows:

- Direct Manager
- Human Resources (hr@readycomputing.com)
- Quality and Compliance (quality@readycomputing.com)
- Legal (legal@readycomputing.com)

1.3.1 Modern Slavery Statement Registry

This Policy complies with the Gov.UK Modern Slavery Statement Registry and all associated UK requirements. On an annual basis, Ready Computing will perform the required actions detailed on the GOV.UK website.

2. STATEMENT AND POLICY

The Company is opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labor, and all other trafficking-related activities (collectively referred to as “modern slavery and human trafficking”) as set forth in this Policy, and is committed to fully complying with all applicable international human rights standards, labor, and employment laws, rules, and regulations. It is the Company's Policy that:

- Modern slavery and human trafficking are practices that will not be tolerated in our own operations, or in our supply chains.
- The Company will take reasonable steps to ensure that modern slavery, human trafficking, and any other associated actions are eliminated from our operations and supply chain.
- The Company is committed to the fair and humane treatment of people in its employment and in its supply chains.
- The Company has developed and maintains a *Code of Ethics* which describes behaviors and actions Company Personnel should observe and follow.
- The Company holds its Personnel accountable to this, and all Company Policies.
- Personnel who violate this Policy will be subject to disciplinary action, up to and including termination of employment.
- Violations may also result in civil or criminal penalties.
- The Quality and Compliance department maintains this Policy and all associated documents
- This Policy and all associated documents undergo regular review and are revised when necessary to accommodate changes to business and the laws/regulations that apply to it.

2.1 Company Controls and Actions

The Company is actively working to mitigate the risks of modern slavery and human trafficking in business operations and supply chains by assessing these risks, and reporting on them with the Company's Executive Team, utilizing its Risk Management Program and the associated records (IMS REC-0002 Risk Register) to ensure 100% compliance. Please navigate to [Appendix B: Associated Documents](#) for a list.

Additionally, Ready Computing has developed and lives by its *Corporate Culture Policy* (CORP POL-0012) where Modern Anti-Slavery is also addressed.

Note: Although all Company documentation is confidential in nature, you may make a formal documentation request by emailing quality@readycomputing.com.

2.2 Supply Chain Accountability

As a condition of doing business with Ready Computing, all third parties must operate with the same principles established in this Policy. This applies to all third-parties that provide goods or services to our organization, as well as third-party entities that the Company partners or subcontracts with. Within these third-parties, this applies to all owners, officers, directors, employees, contractors, agents, and others working on their behalf. All third-parties are responsible for providing their own subcontractors with these principles and ensure that they follow it.

All levels of this Company's supply chain must:

- Have effective controls to ensure that applicable law, regulation, and policy related to Modern Anti-Slavery and Human Trafficking is followed.
- Not retaliate against anyone, who in good faith, reports potential misconduct.
- Cooperate in audits, investigations, and reviews.
- Promptly report potential violations to Ready Computing.

2.3 Reporting

All Company Personnel, affiliates, and agents must report any conduct that is believed to be a violation of this policy to their:

- Direct Manager
- Human Resources (hr@readycomputing.com)
- Quality and Compliance (quality@readycomputing.com)
- Legal (legal@readycomputing.com)

When a legitimate concern manifests and is concerned, additional steps will be taken in order to notify the proper outlets and authorities.

2.3.1 Non-Retaliation for Reporting

The Company ensures that all Personnel have multiple ways they can report a potential issue, and the Company very explicitly guarantees that no individuals who report in good faith will be retaliated against. Retaliation is strictly prohibited against Personnel who report what they believe in good faith to be a violation of this Policy or any law or regulation applicable to the Company, or who cooperate with a report or investigation of such violation.

APPENDICES

Appendix A: Definitions Table

The following definitions are applicable to this Policy:

Term	Definition
Forced Labor	Forced labor encompasses the range of activities—recruiting, harboring, transporting, providing, or obtaining—involved when a person uses force or physical threats, psychological coercion, abuse of the legal process, deception, or other coercive means to compel someone to work. Once a person's labor is exploited by such means, the person's prior consent to work for an employer is legally irrelevant: The employer is a trafficker, and the Employee is a trafficking victim. Migrants are particularly vulnerable to this form of human trafficking.
Bonded Labor or Debt Bondage	One form of coercion used by traffickers is the imposition of a bond or debt. Some workers inherit debt; others fall victim to traffickers or recruiters who unlawfully exploit an initial debt assumed as a term of employment. Traffickers, labor agencies, recruiters, and employers in both the country of origin and the destination country can contribute to debt bondage by charging workers recruitment fees and exorbitant interest rates, making it difficult or impossible to pay off the debt. Such circumstances may occur in the context of employment-based temporary work programs in which a worker's legal status in the destination country is tied to the employer.
Domestic Servitude	Involuntary domestic servitude is a form of human trafficking found in distinct circumstances. It is a crime in which a domestic worker is not free to leave his or her employment and is abused and underpaid, if paid at all. Many domestic workers do not receive the basic benefits and protections commonly extended to other groups of workers—things as simple as a 'day off'. Moreover, their ability to move freely is often limited, and employment in private homes increases their isolation and vulnerability. Labor officials generally do not have the authority to inspect employment conditions in private homes. Domestic workers confront various forms of abuse, harassment, and exploitation. These issues, taken together, may be

Forced Child Labor

symptoms of a situation of domestic servitude. When the employer of a domestic worker has diplomatic status and enjoys immunity from civil and/or criminal jurisdiction, the vulnerability to domestic servitude is enhanced.

Although children may legally engage in certain forms of work, children can also be found in slavery or slavery-like situations. Some indicators of forced labor of a child include situations in which the child appears to be in the custody of a non-family member who requires the child to perform work that financially benefits someone outside the child's family and does not offer the child the option of leaving. Anti-trafficking responses should supplement, not replace, traditional actions against child labor, such as remediation and education.

Table 1: Human Trafficking and Modern Slavery Categories

Note and Reference: Additional categories can be found on the U.S. Department of State's website: <https://www.state.gov/what-is-modern-slavery/>

Appendix B: Associated Documents and References

The following documents are associated to organizational compliance with this Policy:

Reference Number	Title
CORP POL-0012	Corporate Culture Policy
CORP POL-0001	Code of Ethics
IMS POL-0001	Risk Management Policy
IMS POL-0003	Vendor Management Policy
IMS PROC-0002	Risk Assessment
IMS PROC-0009	Monitoring and Measuring Risk
IMS PROC-0013	Vendor Management Procedure
IMS REC-0002	Risk, Opportunity, and CI Register
IMS REC-0021	Risk Assessment Meeting
UK.GOV	Modern Slavery Statement and Registry

Table 2: Associated Documents Table

Appendix C: Revision History

Date	Version	Name	Description	Status
02/11/2022	0.1	Kelsey McCallister	Created initial draft.	Initial draft
02/14/2022	0.2	Anthony Simonetta	Reviewed draft and redlined all sections for alignment and compliance.	Revised
02/14/2022	0.3	Trudy Wade	Added minor edits to language and approved document.	Approved
03/01/2022	0.4	Anthony Simonetta	Approved redlines and added several immaterial fixes to formatting and aligned with applicable policies.	Approved
03/01/2022	1.0	Anthony Simonetta	Finalized and published.	Final
09/15/2022	1.1	Amber Dager	Converted to new template and reviewed formatting.	Revised
12/15/2022	1.2	Anthony Simonetta	Reviewed, accepted, and approved redlines.	Approved
12/15/2022	2.0	Anthony Simonetta	Finalized and published.	Final
02/13/2023	2.1	Anthony Simonetta	Included a proper reference to Appendix A in section 3.1 and cleaned up appendices. Added additional documentation, and expanded the scope of the purpose statement.	Revised
02/13/2023	2.2	Amber Dager	Reviewed and made immaterial changes.	Revised

02/14/2023	2.3	Anthony Simonetta	Reviewed changed, updated Policy, accepted redlines, and sent for Executive Approval. Added references to UK Law and process.	Revised
03/08/2023		Jake Pugh	Approved via chat	Approved
03/09/2023	2.4	James Gallagher	Approved via email	Approved
03/09/2023		Trudy Wade	Approved via email	Approved
03/09/2023	2.5	Anthony Simonetta	Accepted redlines and finalized formatting.	Approved
03/09/2023	3.0	Anthony Simonetta	Finalized and published.	Final

Table 3: Revision History Table

Appendix D: Confidentiality Statement

The information contained within this document is intended for either internal or external use but is confidential in nature. Any review, retransmission, dissemination, or other use of the information in this document by persons or entities other than approved Company Personnel is strictly prohibited. Any unintended recipient of this document is expected to immediately contact the Company and destroy any copies of this document.