

Modern Slavery Statement

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Approved By	Martin Cross, Chief Technology Officer
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1. Modern Slavery Statement

Connect Managed Services (UK) Limited, trading as Conn3ct (“Conn3ct”) is committed to improving awareness of the practices necessary to combat slavery and human trafficking and to continually assess the risk profile of our business in these areas.

Conn3ct is a trusted communications partner that draws on over 30 years of knowledge and experience to solve complex communications challenges in three areas: Contact Centres, Unified Communications and Network Services. Our truly vendor-agnostic capability allows us to build completely bespoke solutions for our businesses. We support a diverse range of blue-chip organisations across the globe in the deployment and management of Unified Communications, Contact Centre and Network Services environments.

We have an annual turnover in excess of the £36 million threshold specified in the Modern Slavery Act 2015.

Our business is organised into Sales, Solution Design and Implementation, Project Management and Operations with supporting functions of Finance, Commercial, Legal, IT, HR and Compliance. Our Head Office is located in the UK and we have additional offices in US and India. Procurement is run from our London HQ and Operations are run from UK, US and India offices.

Our Anti-Slavery and Human Trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships and to ensure that slavery and human trafficking are not taking place in any part of our operations and supply chain.

Company Process and Policy

In our Internal Operations, we have the following policies in place in order to support our commitment to respecting human rights:

- Anti-Bribery & Corruption Policy
- Anti-Fraud Policy
- Dignity at Work Policy
- Equal Opportunities Policy
- HR Security/Recruitment Policy
- Whistle-blowing Policy

The Pre-employment screening process that is part of our HR Security Policy upholds our respect for labour rights and, for our UK employees, includes the review of individuals’ proof of identity, address, and right to work in the UK. We review our pay rates annually to ensure minimum rates are above the statutory minimum and living wage requirements that are applicable in the countries we operate in.

As part of our sales process, we operate a robust costing and approval process to ensure that pricing is adequate.

Supplier Management

Our suppliers have a contractual obligation to ensure compliance with all applicable laws that apply to their supply of goods and services to us, regardless of the jurisdiction in which they operate. Supplier management is carried out in accordance with our Supplier Management Process and Policy. It includes an onboarding process to ensure that suppliers and third parties agree to adhere to our Anti-Slavery and Human Trafficking Policy before we engage them. Supplier Management includes annual reviews with key suppliers, and we aim to develop the Supplier Review format this year in order to include confirmation of continued compliance with our Anti-Slavery and Human Trafficking Policy.

Risk Assessment

Using the [Social Responsibility Alliance's](#) recommended template, we have undertaken a review to identify and assess potential risk areas in our relationships with our contractors and suppliers and maintain a register detailing the same.

We have identified that we have a few suppliers who potentially pose a higher risk, given the locations in which the services are provided. We will mitigate this by assessing the skill levels of workers and by having contractual controls in place requiring our suppliers to agree to our Anti-Slavery and Human Trafficking Policy.

Training & Communication

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we have placed our Anti-Slavery and Human Trafficking policy on our intranet, which is easily accessible by all staff. All staff are asked to confirm that they have read and understood the Policy.

All Conn3ct staff are encouraged to report any concerns regarding slavery and /or human trafficking in accordance with our Whistleblowing Policy.

Looking Ahead

We will develop a formalised Employee Code of Conduct Policy and a specific Supplier Code of Conduct Policy set over the next 12 months.

We will develop more detailed training for workers who have direct responsibility for supply chain management and recruitment within the next 12 months.

We will continue to develop our Supplier Management Risk Assessment Process by ensuring adequate resource is assigned to the process and by the provision of ongoing monitoring via our Management Systems.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our anti-slavery and human trafficking statement for the financial year ending 30 April 2020.

Signed by Martin Cross, Chief Technology Officer on behalf of the Board of Directors
Connect Managed Services (UK) Limited, trading as Conn3ct – Tuesday 2nd June 2020

2. Information Classification

This document is classified as Public.

3. Review

This document shall be reviewed on an annual basis, unless changes to business operations, relevant legislation or codes of practice necessitate an earlier amendment.

4. Version Control

Date	Version	Changes	Reviewer Name & Job Title	Approver Name & Job Title
28/7/2020	V1.4	Branding updated and version control table added. Wording amended to reflect additional responsibilities of turnover being greater than £36m.	Fiona Thompson, Compliance Manager	Alex Tupman, CEO Martin Cross, CTO Pete Francis, CFO