

Modern Slavery Policy Statement

Modern Slavery Act 2015 - Background

Modern supply chains are often extremely long, complex and international. The goods that are bought and sold in the UK are produced worldwide. Companies sourcing their products overseas must be confident that those they do business with are not using forced or trafficked labour so that consumers in the UK can be equally confident that the goods and services they buy are free from slave labour. Under the Companies Act 2006, large, listed companies must report on human rights issues, and these reporting requirements were strengthened further in 2015. From 1st April 2016, under the Modern Slavery Act, the Government has committed to introducing measures that specifically address modern slavery. It has introduced a legal duty on all businesses with a turnover of more than £36m to report annually on the steps they have taken to ensure modern slavery is not happening within their business or supply chains anywhere in the world.

Reporting on these issues allows the public, consumers, employees and investors to know what steps an organisation takes to tackle modern slavery and have greater confidence in the goods and services they buy. Whilst the turnover of Ciptex is below £36m, we support this initiative and have produced this Policy to inform our staff and underline our commitment to this initiative to both our supply chain and our customers.

Introduction to the Act

Article 4 of the Human Rights Act is the right to be free from slavery or forced labour. In introducing the Modern Slavery Act 2015, the Government recognises the unique and strong position that organisations with significant resources and purchasing power have to influence global supply chains. The Transparency in Supply Chains provision contained within the Modern Slavery Act seeks to address the role of businesses in preventing modern slavery from occurring in their supply chains and organisations.

Modern Slavery is a term used to encapsulate the two offences in the Modern Slavery Act 2015: slavery, servitude and forced or compulsory labour, and human trafficking.

Forced labour and human trafficking can occur in business operations in a variety of ways:

- Directly – by employing a trafficked or exploited person within the business or through a subcontractor or recruitment agency;

- Indirectly – through illegal subcontracting occurring within the supply chain or through use of products or materials which people under conditions of forced labour have produced;

- By association – where trafficking occurs within the local area due to a company's operations, or as a secondary consequence of a company's actions.

Section 54 of the Modern Slavery Act 2015 requires that any commercial organisation in any sector, which supplies goods or services and carries on business in the UK, with a turnover threshold of £36m, must produce a slavery and human trafficking statement for each financial year. The provision requires an organisation to be transparent about what is happening within its business. This means that if an organisation has taken no steps to ensure slavery and human trafficking is not taking place, they must still publish a statement stating this to be the case.

The Government encourages all businesses to develop an appropriate and effective response to modern slavery. Businesses may choose to take further action over and above what is prescribed by the Act but this will be a decision for individual businesses themselves. The provision seeks to create a race to the top by encouraging transparency and increasing competition to drive up standards.

Ciptex Ltd Slavery and human trafficking statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (the 'Act') and reassures that Ciptex Ltd continues to ensure that modern slavery and human trafficking ('Modern Slavery') is not taking place within its business or supply chain.

In accordance with the Act, employers have a responsibility to be transparent about their efforts to ensure Modern Slavery is not taking place in their organisation. Ciptex Ltd has a zero-tolerance approach to any form of Modern Slavery, and we are committed to acting ethically and with integrity in all business dealings. Below are just some of our ways of pursuing that commitment.

Company Structure

The Company currently operates in the following countries:

United Kingdom, providing hosted telephony, hosted contact centre and associated services from third party data centre locations in London and Manchester and utilising Amazon Web Services cloud computing which is distributed across the globe.

We have one office location in Central Manchester

Our Policy on Modern Slavery

The policies we have in place and our Slavery and Human Trafficking statement, reflect our commitment to:

- Acting ethically and with integrity in all aspects of our business
- Paying a fair wage to individuals for their work
- Enforcing effective systems and controls to ensure Modern Slavery is not taking place in any aspect of our business

This includes the following:

Fair Pay

Ciptex Ltd is committed to ensuring all employees receive fair remuneration for the job they undertake. This includes complying with all applicable UK employment legislation relating to employee terms and conditions, including pay. Additional protections such as fixed-hour contracts, holiday pay, sick pay and statutory payments for sickness and maternity are given. Ciptex is a Living Wage Employer.

Whistleblowing

The detection and reporting of Modern Slavery is the responsibility of all staff, and any concerns should be raised at the earliest possible opportunity. Any reported breach of this Policy will be investigated and may lead to disciplinary action, which may subsequently result in employee dismissal. Ciptex has a Whistleblowing Policy in place.

Our Supply Chain

We seek to partner with suppliers that adopt the same strict standards that we adhere to. We expect our suppliers to operate fair and ethical workplaces, where workers are treated with dignity and respect, and the highest standards of human rights are upheld. We require all supply chain partners to conform to our

Partnership Code of Conduct.

Employee Health and Wellbeing

We are committed to providing a safe and healthy working environment and improving the quality of working lives for all employees. We continue to invest in and support the health and wellbeing of our staff.

Due Diligence

Our due diligence includes undertaking checks on ID and Right to Work documentation when workers first join us ensuring the correct information has been obtained to permit us to employ the individual.

Risk

As a supplier of services rather than products, the nature of our business presents a low risk of encountering forms of Modern Slavery. However, we do use a supply chain of partners to create the tools we use and to deliver our services. It is important that we understand the end to end delivery from third parties by mapping the end to end supply chain, particularly when that delivery is to higher risk locations around the globe – refer to <https://www.globalsslaveryindex.org/2018/findings/global-findings/> for a list of high risk countries.

Our Commitment

Slavery and human trafficking are a criminal activity and a violation of human rights. The exploitation of an individual for commercial gain is a deprivation of human liberty and for this reason unacceptable and a matter of zero tolerance for Ciptex Ltd.

Due to the nature of our business, we consider the risk of Modern Slavery existing within our business to be low. Ciptex Ltd will regularly evaluate the nature and extent to the risk of modern slavery occurring in its supply chain. Where instances of Modern Slavery are suspected, they should be reported immediately to senior management who will act based on guidance provided by the Chartered Institute of Purchasing and Supply [CIPS Remediation](#).

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors has reviewed and endorsed this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Steve Walker

Position: Chief Revenue Officer

Date: 05 Feb 2022

Signature: 