



Statement on Modern Day Slavery and People Trafficking

Financial Year ending 31/12/2018

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Document Control

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Document Approval

Approved By:	Frank Asante-Kissi (Director)	Approved by e-mail
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Revision History

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0.1	10/01/2018	Richard Dudley	Draft	First draft for comment
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1 INTRODUCTION

1.1 Purpose

The Modern Slavery Act 2015 (the Act) requires companies operating in the United Kingdom (UK) to disclose information regarding the steps taken to eradicate slavery and human trafficking from their business and global supply chains.

This document defines the policy of Connectis CMC UK Limited, Getronics Services UK Limited, Pomeroy IT Solutions UK Limited (“**Getronics**”) on Modern Day Slavery and People Trafficking and the actions taken by Getronics in 2018 to reduce the risk of forced labour and human trafficking taking place in the Getronics organisation and the Getronics Supply chain.

Furthermore, we intend to use this statement to provide stockholders, customers, and suppliers with the ability to make informed choices about the companies they support.

Section 54 of the Modern Day Slavery Act includes a provision which requires commercial organisations above a turnover of £36m to produce a slavery and human trafficking statement for each financial year setting out what they have done to ensure there is no modern slavery in their supply chains or own business (or that they have taken no such steps).

1.2 What and why this is required

The statement must set out what steps Getronics has taken during the financial year to ensure that modern slavery is not occurring in Getronics or its supply chain. When the Act refers to ensuring that slavery and human trafficking is not taking part in any part of an organisations supply chain, this does not mean that the organisation in question must guarantee that the entire supply chain is slavery free. Instead, it means an organisation must set out the steps it has taken in relation to any part of the supply chain (that is, it should capture all the actions it has taken).

Failure to comply: If an organisation fails to produce a slavery and human trafficking statement for a particular financial year the Secretary of State may seek an injunction through the High Court requiring the organisation to comply.

The Modern Slavery Act does not dictate in precise detail what a statement must include or how it should be structured. It does, however, provide a non-exhaustive list of information that may be included.

A statement may include information about:

- the organisation’s structure, its business and its supply chains;
- its policies in relation to slavery and human trafficking;
- its due diligence processes in relation to slavery and human trafficking in its organisation and supply chains;
- the parts of its organisation and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
- its effectiveness in ensuring that slavery and human trafficking is not taking place in its organisation or supply chains, measured against such performance indicators as it considers appropriate;
- the training and capacity building about slavery and human trafficking available to its staff.



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It is not compulsory for an organisation to include these points in its statement, (except in so far as these reflect the actual steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in their supply chains or own business).



2 POLICY STATEMENT

Getronics is an ICT Services business which provides a complete portfolio of integrated ICT services for the large enterprise and public sector markets. This includes Workspace, Applications, Communication, Data Centre, Cloud, Consulting, Product and Managed Services.

Getronics is part of the wider Getronics family consisting of both the Getronics, Connectis and Pomeroy brands.

Getronics procure a variety of goods and services both for internal support and Getronics customers.

Procured goods include:

- ICT products and spares to meet both external and internal requirements
- ICT software
- Office Consumable and Equipment Supplies.

Procured Services include:

- 3rd Party Maintenance
- Logistics
- Financial, legal, insurance and other Professional services
- Recruitment
- Service Desks
- Fleet Services
- Training
- Travel.

The original manufacturer of goods procured by Getronics could be from locations across the globe. It would not be feasible for Getronics to audit the end to end supply chain. Getronics can and will however work to ensure the goods and services which Getronics procures are from manufacturers who have a strong anti slavery policy and are taking action themselves to remove the risk of modern day slavery from their supply chain.

Getronics is committed to eradicating human exploitation from Getronic supply chain. All Getronics suppliers must comply with the Getronics Supplier Code of Conduct which includes the following requirements:

Human Rights

Getronics suppliers will support and respect the protection of internationally proclaimed human rights and will operate in the spirit of the Universal Declaration of Human Rights. This includes, but is not limited to, the following subjects:

Getronics suppliers will recognise and respect:

- Fundamental human rights, social justice and human dignity
- Diversity of local cultures.



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Labour

Getronics suppliers will support and respect the internationally proclaimed labour rights and will operate in the spirit of the core Conventions of the International Labour Organisation (ILO). This includes, but is not limited to, the following subjects:

Getronics suppliers will recognise and respect employee's right to:

- Collective bargaining
- Freedom of association.

Getronics suppliers will not indulge in acts of:

- Discrimination
- Child labour
- Forced labour.

Getronics suppliers will:

- Compensate its workers in accordance with all applicable wage laws
- Limit the working hours to the maximum as set by applicable laws
- Ensure a safe working environment.

Getronics have implemented and continue to follow processes to achieve the level of transparency and traceability necessary to ensure that Getronics procurement practices do not contribute to modern day slavery at any stage in the Getronics supply chain.

Steps to achieve this aim include:

- Getronics require all new Getronics suppliers to sign the Getronics Supplier Code of Conduct
- Getronics periodically require Getronics suppliers to sign the Getronics updated Supplier Code of Conduct
- Getronics continue to map and assess the Getronics supply chain to identify potential risk of forced labour and people trafficking within it
- Getronics requests that all Getronics supplier warrant that their workers are paid at least the minimum or living wage required by local law
- Getronics ensures that robust immigration checks are in place with all Getronics suppliers
- Getronics raise awareness of modern day slavery within the Getronics business, through its policies and training.

Below are some useful links in relation to Modern Day Slavery and Human Trafficking:

Modern Slavery Act 2015 - <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

Walk Free Global Slavery Index - <http://www.globalslaveryindex.org/>

ILO Resources on Forced Labour, Human Trafficking and Slavery - <http://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>



Verité eLearning on Supply Chain Accountability - <http://www.verite.org/research/elearning>

3 APPROVALS

Getronics Services UK Limited:

(Frank Asante-Kissi - Director)

Connectis CMC UK Limited:

(Frank Asante-Kissi - Director)

Poméroly IT Solutions UK Limited:

(Frank Asante-Kissi - Director)



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