

# MODERN SLAVERY TRANSPARENCY STATEMENT

This statement constitutes Redcentric plc's statement on slavery and human trafficking under section 54 of the Modern Slavery Act 2015 for the financial year ended 31 March 2022 ("FY22"). This statement sets out the steps that we and the Redcentric Group (defined below) have taken and will continue to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

## Redcentric Group Structure

Redcentric plc's primary focus is the provision of IT managed services to the private and public sector, mainly in the United Kingdom. We are the parent company of the "Redcentric Group", which is made up of the following group trading companies:

- Redcentric Solutions Limited;
- 7 Elements Limited;
- 4D Data Centres Limited;
- Redcentric Solutions Private Limited and Redcentric Support Services Private Limited (both Indian companies that provide support services to the Redcentric Group).

The Redcentric Group has a combined annual turnover of £93.3 million.

## Our Business

Our mission is to deliver agile, available and assured IT solutions that help organisations succeed, with a client base that is predominantly in the United Kingdom, and in both the public and private sectors. Our range of services includes network provision and management, cloud services, IT security, managed services and also extends to the provision of professional services, both standalone and linked to wider projects with our customers.

## Modern Slavery

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and are committed to ensuring that there is no slavery or human trafficking in our supply chain or in any part of our business. Our anti-slavery and human trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

A copy of our anti-slavery and human trafficking policy is available on request.

## Supply Chain

Our supply chain includes organisations within the IT sector, for example suppliers of:

- computer and telecommunications equipment
- software
- computer and telecommunication services

The nature of IT means that the supply chain is worldwide and in sourcing goods and services our procurement function undertakes a modern slavery risk assessment. Typically we deal with recognised suppliers that have ethical policies that meet at least our minimum expectations.

We also engage with businesses to provide ordinary business support, for example suppliers of:

- temporary staff, including specialist IT consultants
- logistics services
- cleaning services

These tend to be engaged locally, as the need arises. These may be smaller businesses than those in our IT supply chain and have slightly different ways of working than the larger suppliers, however we still ensure that we undertake a thorough modern slavery risk assessment and only engage suppliers that are prepared to meet our standards.

Our Indian subsidiaries, Redcentric Solutions Private Limited and Redcentric Support Services Private Limited, mainly provide services to the rest of the Redcentric Group. Additional local checks are made to minimise the risk of modern slavery and human trafficking in the local Indian supply chains.

## Risks

We believe that we are well placed to manage the risks of modern slavery and human trafficking. The nature of our industry means that our main IT equipment, services and software are supplied by international businesses that have well resourced ethical trading teams. Where we are sourcing locally our procurement teams have procedures in place to minimise risks and are trained to spot the signs of individuals who may be subject to modern slavery pressures.

We recognise that India is considered to be a higher risk environment than the United Kingdom. We have taken account of this and require our local supply chain to adhere to the same ethical standards as our United Kingdom supply chain. Our team in India have a heightened awareness of the risks and are careful to only select supplier meeting our objective standards.

## What Are We Doing to Prevent Modern Slavery?

It is our belief that, with the cooperation and rigorous policies of our suppliers, we can eliminate slavery from our supply chains. As part of our initiative to identify and mitigate risk, we have in place a number of processes to:

1. identify and review potential risks in our supply chains;
2. when we identify a potential risk, we seek to mitigate the risk of slavery occurring through modern slavery assessments;
3. on an ongoing basis, continue to monitor potential risk areas; and
4. protect whistle blowers.

Following the external review of our compliance that was completed in financial year ending 31 March 2021 ("FY21") and the extensive changes made to our processes as a result, we have continued to build and reinforce those processes in FY22. To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, we educate our employees regarding the types of factors that can indicate whether any worker (permanent or temporary) in the Redcentric Group's supply chain is subject to undue influence. In doing so, the Redcentric Group actively encourages employees to report any suspicious activity to their line manager or a board member.

In addition, the Redcentric Group operates a whistleblowing policy that allows employees to raise any concerns they may have, in a protected environment (with their identity withheld if appropriate). The process allows direct access to a named board member if an individual is concerned about their line manager's complicity in any infringement. All whistleblowing about a potential wrongdoing will be investigated and the results communicated to the employee, as well as the business taking appropriate action to address any concerns the investigation reveals. This encourages employees to

highlight any concerns or potential evidence of modern slavery and ensures that all matters raised through this hotline are addressed at board level.

The Redcentric Group completed a number of acquisitions in FY22. As part of the due diligence activities carried out in relation to these acquisitions, our procurement and HR teams reviewed the supply chain and recruitment policies and processes of the acquired businesses to understand and highlight any slavery risks.

We have updated our anti-slavery policy to better reflect the changing risks and have rolled this out across the extended Redcentric Group.

We have introduced relevant training to all employees both in the UK and India, raising our colleagues' awareness of slavery issues and highlighting the steps that Redcentric and individuals can take to combat slavery.

## Supplier Adherence to Our Values

It is of paramount importance that we only work with suppliers who treat their obligations regarding modern slavery to an equivalent level of importance as does the Redcentric Group. We will not work with any organisation within our supply chain that is unable to demonstrate a corresponding commitment to modern slavery, irrespective of whether they are required to do so statutorily or otherwise. Where possible, we build long-standing relationships with our customers and major suppliers, making clear our expectations of business behaviour. The programme that we launched in FY21 (whereby all suppliers are notified of the Redcentric Group's anti-slavery and human trafficking policy and are expected to make a declaration stating that they comply with it or that they adhere to their own equivalent standards) has started to be applied across the supplier network of the acquired businesses. This has included the continued roll out of standard procurement terms for the purchase of goods and services which include modern slavery compliance provisions.

The Redcentric Group conducts rigorous checks to verify the identity of each worker and their right to work in the UK and India respectively. We have also recognised the increased risk of modern slavery in relation to the use of temporary employees in the business, and as a result we have introduced a process whereby the Redcentric HR team has direct oversight of all temporary hires including standard checks and documents which are used for each engagement. The HR team also completes audits of our agency suppliers against legislative compliance, including compliance with the Modern Slavery Act 2015.

## Further Steps

Following the embedding of steps to ensure that there is no slavery in our supply chains, we intend to take the following further steps to combat slavery:

1. we will continue to identify, monitor and assess any key risk areas in our supply chains and will continue the processes implemented to address such key risks as applicable; and
2. we will continue our work to ensure that our processes and policies are fully aligned and integrated within the enlarged Redcentric Group such that the key risks are appropriately and consistently addressed.

## Board Declaration

This statement has been approved by Redcentric plc's board, who will review and update it annually, and has been personally executed by Peter Brotherton, Chief Executive Officer.



7 September 2022