

Release Certificate

Status of this Document: Final

Document Version: 1.0

Release Date: 29/10/2024

Document Control

Title:	Modern Slavery Policy
Client:	N/A
Reference:	Modern Slavery Act 2015
Classification	External
Version:	1.0
Release Date:	29/10/2024
Author:	James Cox
Total Pages:	10
Disclaimer:	This document is protected by copyright laws in England and other countries and must not be copied, stored in a retrieval system or transmitted in any form or by any means in whole or in part without the prior written permission of Bespoke IT Solutions Ltd.

Document Approval

Approved By:	Steve Newton	Approved by e-mail
--------------	--------------	--------------------

Revision History

Version	Date	Issued By	Status	Comments
0.1	18 Oct 24	J Cox	Draft	For review
1.0	24 Oct 24	J Cox	Final	

Contents

Document Control	0
Document Approval.....	0
Revision History	0
1 Introduction.....	1
2 Policy	2
3 Responsibilities.....	3
4 Documentation	4
5 Actions we are taking	5
6 Due diligence, monitoring and audit processes.....	7
7 Penalties for breach.....	8
8 training	9
9 Key performance indicators.....	10

Uncontrolled when Printed

1 INTRODUCTION

1.1 Purpose

Our business, Bespoke IT Solutions is committed to combatting slavery and human trafficking in its business and supply chains, and we make this statement to assist with compliance with the Modern Slavery Act 2015. This statement relates to the financial year ending 01/04/2025.

1.2 Intended audience

All staff and contractors.

1.3 Responsibilities

	Create	Establish	Communicate	Implement	Review	Comply
Senior Management	X	X	X		X	X
Wider Management			X	X	X	X
Quality Team					X	X
Team Leaders				X		X
All staff and contractors						X

2 POLICY

As our business has a turnover of less than £36 million, we do not have a legal obligation to produce a modern slavery statement. However:

- a. We agree that exploitation within all supply chains ending in the UK is a blight on our society, and we are committed to playing our part in eliminating exploitation.
- b. We understand that customers with obligations under the Modern Slavery Act 2015 cannot comply with those duties without our cooperation.

Uncontrolled when Printed

3 RESPONSIBILITIES

- The Director is responsible for overseeing our efforts to help to eliminate modern slavery and for monitoring progress towards the KPI's contained in this document.
- The Business Manager is responsible for ensuring that all recruitment and terms and conditions of employment comply with statutory requirements, and that any agencies used are appropriately checked and commit to ethical standards.
- Managers are responsible for upholding our "core values" and for ensuring that employees who work for them also behave in accordance with these.
- Our Sales Team is responsible for ensuring that appropriate checks are made prior to placing any orders with new suppliers, and that existing key suppliers are compliant with modern slavery policies. They will also work with our major customers to provide them with appropriate information on our modern slavery initiatives and to gain suggestions and feedback.

Uncontrolled when Printed

4 DOCUMENTATION

We have the following policies in place for employees:

- Grievance
- Whistleblowing
- Equality, Diversity and Inclusion Policy
- Conflict of Interest
- Receiving gifts

These are referenced in our [company handbook](#).

Uncontrolled when Printed

5 ACTIONS WE ARE TAKING

5.1 Employees

- 5.1.1 We have a recruitment and selection policy to assist compliance with equality opportunities.
- 5.1.2 All new employees are recruited directly, and we conform to the ethical standard set out in the company handbook. Right to work checks are conducted prior to joining, and we check with all new recruits they have not been required to pay any fees to gain work with us, and inform them of the procedures that need to be followed should they wish to leave our employment. In addition, we check that their passports have not been withheld and that they have not been required to sign any agreements with third parties in respect of our offer of employment.

5.2 Agency Workers

- 5.2.1 We only use agency works sparingly, for temporary placements and holiday / sickness cover.
- 5.2.2 We will ensure that any recruitment agencies we use have strict compliance with Modern Slavery Act and require written confirmation from them that no agency worker is being exploited as part of any slavery or human trafficking. Recruitment agencies used will all be on our Preferred Supplier Listing.

5.3 Suppliers of raw materials

- 5.3.1 All suppliers are issued with our Supplier's Ethical Code of Conduct which they commit to, and which sets out key minimum standards relating to employment and workers. This will be extended to cover modern slavery. Our supplier contracts have been updated to include clear provisions that require our suppliers to commit to taking clear steps to eliminate modern slavery, both within their own business and also within their own supply chain (including with anyone with whom they sub-contract).
- 5.3.2 Suppliers are required to self-certify their compliance with the code but contractual provisions also include that we may undertake ad hoc site visits, audits and regular monitoring etc (or to end the contract early, and without penalty to us, in the event of a breach). Contractual penalties may be awarded against any supplier for a breach of contract, or for incorrect self-auditing responses, questionnaires or the giving of incorrect information.
- 5.3.3 Major suppliers are requested to inform us of the steps that they are taking to eliminate modern slavery.

5.4 Customers

- 5.4.1 We also work closely with our major customers to ensure optimum environmental friendliness and to ensure that our practices and procedures are in line with national

standards. This statement is brought to the attention of our customers via our website.

Uncontrolled when Printed

6 DUE DILIGENCE, MONITORING AND AUDIT PROCESSES

- 6.1** All suppliers are issued with our **Code** of Conduct and are required to sign and return a commitment to ensuring that they take appropriate steps to ensure that their businesses and supply chains are free from modern slavery. prior to any orders being placed with them.

Uncontrolled when Printed

7 PENALTIES FOR BREACH

- 7.1** If a supplier is found to be involved in any form of modern slavery, its contract will be terminated either immediately or on its due renewal date, depending on the severity of the breach and we may also report any suspicions of criminal activity to the police.
- 7.2** If the breach is a minor one, we commit to helping that supplier by providing guidance and support for the affected workers as follows: Guarantee to extricate.
- 7.3** If it is established that any employee has acted in breach of any of our policies, or is aware of, has condoned or failed to report any suspicion of modern slavery within our business or supply chains, he/she will be subject to our disciplinary procedure.

Uncontrolled when Printed

8 TRAINING

- 8.1 We will provide suitable training for all employees to ensure that they are aware of this Statement and can be vigilant in identifying and reporting any concerns they have.
- 8.2 Employees and managers are informed of any updates to our policies via e-mail. In addition, the following have received detailed training on our supply/tendering processes: Refresher courses are held on an annual basis.

Uncontrolled when Printed

9 KEY PERFORMANCE INDICATORS

9.1 The following Key Performance indicators we will use to assess our progress in the year 2024/2025 towards eliminating modern slavery:

9.1.1 All staff in sales will be aware of this policy

9.1.2 All suppliers confirm that they comply with modern slavery policies and procedures.

Uncontrolled when Printed