MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Secon Cyber, we have a zero-tolerance approach to modern slavery, and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking.

Our Business and Supply Chain

Secon Cyber are a cyber security value added reseller and service provider. We are based in the UK (Hersham, Surrey), operating primarily in the UK and Ireland but also some clients in Europe and the rest of the world. Our vendor partners are also international. We provide a range of technical services alongside the products (software, hardware and cloud services) that we sell.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Risk Assessment

In the past year, we conducted a risk assessment of our supply chain by taking into account:
• The risk profile of individual countries based on the Global Slavery Index
• The business services rendered by the suppliers
• The presence of vulnerable demographic groups
• A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

Policies

Secon Cyber operates the following policies for identifying and preventing slavery and human trafficking in our operations:

• **Whistleblowing Policy** - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.

• **Code of Conduct** - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

• **Purchasing Code** - we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

• **Supplier Due Diligence** – Secon Cyber conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:
  • Assessing risks in the provision of particular services
  • Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
  • Requiring improvements to substandard employment practices
  • Sanctioning suppliers that fail to improve their performance in line with our requirements

• **We require all suppliers to attest that:**
  • They don't use any form of forced, compulsory or slave labour
  • Their employees work voluntarily and are entitled to leave work
  • They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
  • They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
  • They don't require employees to surrender their passports or work permits as a condition of employment

Awareness
Secon Cyber has raised awareness of modern slavery issues by communicating with all staff by email, which explains:
  • Our commitment in the fight against modern slavery
  • Red flags for potential cases of slavery or human trafficking
  • How employees should report suspicions of modern slavery
  • The Employment Contract for all staff includes an attestation that they will abide Secon Cyber's anti-slavery policy.

Measuring How We're Performing
Secon Cyber regularly reviews this statement, the performance of our suppliers and current best pratoce to help ensure the organisation has necessary controls in place to combat modern slavery and human trafficking in our organisation and supply chain.