



# MODERN SLAVERY AND HUMAN TRAFFICKING POLICY AND STATEMENT

POL127

Class 1 – General B2B Use / Public

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## 1 Purpose and Scope

This statement is applicable to the Nasstar Group of companies and its operating divisions in the UK and overseas, hereafter referred to as 'Nasstar', 'us', 'our', 'Group', or 'we'.

The purpose of the statement is to communicate our ongoing commitment to The Modern Slavery Act 2015 and covers the financial year of January 2022 to December 2022.

This policy and any contained procedures or processes are statements of general policy and do not form part of any employee or worker's terms and conditions of employment or otherwise have contractual effect. The content of this document can be changed, withdrawn, or modified at our discretion at any time. Whilst Nasstar will endeavour to provide notice of any such change, we are not under an obligation to do so.

## 2 Policy

Nasstar recognises that Modern Slavery is a crime under the Modern Slavery Act 2015 in the UK. It also operates in Malaysia and this Policy applies equally to all.

We are aware that Modern Slavery takes various forms. It involves using force, deception, coercion and abuse of vulnerability, for the purpose of exploitation.

The Group adopts a zero tolerance to modern slavery, human trafficking, all forms of servitude and forced and compulsory labour.

We fully support the government's objectives to eradicate all forms of modern slavery and human trafficking.

We will ensure that our activities and those of our suppliers operate to the highest level of ethical standards operating under sound governance arrangements.

Our annual statement provides details of our activities, our supply chains and actions we are continuing to take to support government.

## 3 Responsibilities

Modern Slavery compliance is managed by three co-ordinated teams in Nasstar with responsibilities detailed below.

They are responsible for carrying out an initial assessment of any report of suspected instances of modern slavery.

### 3.1 Procurement

Responsible for supply chain management and ensuring the necessary risk assessments and supply chain related requirements are implemented.

### 3.2 HR / People team

Responsible for ensuring the required training is delivered to employees. Also for setting out working practices that do not place excessive working hours requirements on employees, providing fair pay always at or above legal thresholds and providing regular and reliable employment

### 3.3 GRC

Responsible for ensuring this Policy is reviewed at least annually in conjunction with HR and Procurement.

Where required, they are also responsible for auditing compliance with this Policy and ensuring any resulting actions are appropriately owned, managed and resolved.

### 3.4 Employees

We require all employees to be aware of this issue, and they suspect modern slavery is happening, to report it.

The following are the various ways of doing this:

- In emergency situations, always contact the police.
- In the UK, contact the Modern Slavery helpline. It's completely anonymous and calls from landlines and most mobiles are free. 0800 0121 700
- Report your suspicions online using the dedicated home office website:  
<https://www.modernslaveryhelpline.org/report>
- Following our Whistleblowing Policy
- Speak to your line manager or the HR/People Team.

### 3.5 Supply Chain

We require all organisations we engage with to ensure their goods, materials, and labour related supply chains:

- Fully comply with the Modern Slavery Act 2015.
- Fully comply with our Supplier Code of Conduct.
- Clear, transparent, accountable, and auditable.
- Free from ethical ambiguities.

### 3.6 KPIs

The following have been agreed:

# NASSTAR

- All new employees to receive Modern Slavery e-learning on joining the company and for this to be completed within 14 days of this date.
- Zero reports of internal breaches of this Policy.
- To carry out an initial assessment of any report of suspected modern slavery within 72 hours of being notified.
- To ensure 100% of new suppliers are onboarded through the agreed process to ensure that an initial assessment of compliance can be undertaken, and the Supplier Code of Conduct issued to them.



## 4 Sanctions

Failure to comply with Group policies, procedures or processes that are aimed at ensuring compliance with the Modern Slavery Act and this Policy will be investigated and managed in accordance with the Company's Disciplinary & Capability Procedure, and / or through our supplier management processes as appropriate.

## 5 Modern Slavery and Human Trafficking Statement

### 5.1 2022 Modern Slavery Status

We have had no reported modern slavery issues during 2022.  
We have had no cause to carry out any investigations or audits.

### 5.2 Our Stance

Nasstar is a cloud services specialist. With an integrated suite of services, we design, implement, and manage multi-cloud solutions, innovative communication tools and high-performance networking to help our customers transform and modernise.

Our Board of Directors is committed to creating a safe, fair and inclusive working environment for all employees and contractors.

We have a zero-tolerance approach to both modern slavery and human trafficking in the provision of services to customers as well as whilst in direct or indirect contact with any individual.

Our expectations with regards to compliance to modern slavery and human trafficking are communicated to all employees and suppliers.

We are dedicated to ensuring that everything we do is ethical and lawful, and that we work in a socially and environmentally sustainable way internally and that the same is reflected across our supply chains.

### 5.3 Our supply chain

Suppliers' relationships are managed by our Procurement Team in conjunction with designated teams and individuals.

This team map our supply chain and assess modern slavery risks.

In order to deliver services to customers, we purchase equipment, software and services from a wide range of suppliers. The vast majority of supplier services are purchased from world renowned brands and are supplied through distribution channels within the UK and we have no areas of our supply chain where there is a high risk of modern slavery or human trafficking.

To ensure our suppliers and contractors comply with our values, we have in place a Supplier Code of Conduct which all suppliers and contractors must adhere to and which is issued as part of our supplier onboarding process. All suppliers and contractors are required to adhere to the obligations set out in the Supplier Code of Conduct which cover:

- Compliance with Legislation.
- Child Labour.
- Forced Labour.
- Freedom of Association and Right to Collective Bargaining.
- Compensation and Working Hours.
- Discrimination.
- Business Continuity Planning.
- Improper Payments and Bribery.
- Environment.

Supplier or contractor non-compliance will result in us reviewing the contractual relationship with the offending party.



## 5.4 Compliance Controls

We review our Modern Slavery and Human Trafficking Policy and Statement at least annually, along with all other related internal policies, to ensure we have incorporated the latest legislation and we have the correct policies, procedures and working standards in place to ensure our staff know how to tackle any issues.

We provide training to our employees on this subject through e-learning as part of our induction process to ensure recognition of any contravention of law relating to modern slavery is dealt with appropriately and efficiently. Nasstar ensures all employees also complete this e-learning annually to ensure continued awareness and compliance.

We conduct reviews and potentially audits on suppliers and contractors where we have concerns, to ensure they are compliant with all aspects of the Modern Slavery Act 2015.

All new suppliers and contractors follow an on-boarding process which requires clarification of their approach to ensuring compliance with this legislation.

Internally, to ensure our compliance, prior to any member of staff commencing employment (either on a temporary or permanent basis), relevant checks are undertaken to ensure the individual has the legal right to work within the UK.


We review our own internal processes as part of our wider compliance management obligations. Any issues identified which contravene modern slavery legislation are dealt with promptly and any corrective and/or preventative measures are put into place as necessary.

Various mechanisms are in place to allow for concerns to be raised anonymously regarding employees or suppliers.

Internal policy breaches will be investigated and managed in accordance with our Disciplinary & Capability Procedure.

## 5.5 Further Steps and Continued Development

We are committed to improving our practices to combat slavery and human trafficking. We will take further steps to engage with our current and new suppliers, contractors and employees to make sure they comply with all relevant legislation and to minimise any risks.

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Tim Ampstead  
Finance Director

18 July 2023

## 6 Document details and change summary

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