

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 August 2020 to 31 July 2021.

The Statement sets down Hasob Technology Services' commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Modern slavery is a crime and a 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.

Hasob Technology Services has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

This statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

Organisational Structure and Supply chains

Hasob Technology Services is established to provide managed I.T services to businesses. At the core of our practice is IaaS (Infrastructure as a Service), upon which all other services we provide is built.

At the helm of Hasob Technology Service's business operations is the Business Director to whom all department heads report.

Our business activities include the development of web and mobile applications, cybersecurity services, hosting and management of applications and workloads in the cloud. We also supply ICT and Industrial equipment to businesses.

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Our business structure is as defined by our partner relationship with the manufacturers (OEM) we represent, which includes providing professional

consultancy and managed services and operating as a value-added reseller. The Company currently operates in the United Kingdom.

As a Company we undertake the following risk assessment processes in relation to modern slavery or human trafficking:

1. We have incorporated, and are constantly developing, modern slavery risk assessment training which conforms with the new legislation and Government guidance into our current training processes.
2. We seek out an annual modern slavery statement as written by our suppliers which discloses the steps taken to ensure that slavery and human trafficking are not taking place in their operations and supply chains.
3. Incorporating new practices into our recruitment or induction process which includes checking documents to help highlight any operatives unwilling to provide that information. It could be an indicator of potential risk, requiring further investigations and helping us spot workers at risk.
4. Engaging external specialists who are capable of undertaking additional due diligence and providing tailored guidance to manage specific risks based on prior relevant experience.

High Risk Activities

Our procurement activities remain high risk for modern slavery with regards to contracts and supplies as we rely on sub-contractors and other businesses within the supply chain.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 Policies: The HR Manager is responsible for creating and reviewing policies. The process by which policies are developed is by looking at best practice and adapting them to the needs of the Company.
- 1.2 Risk assessments: The Administration Manager is responsible for risk assessments in respect of human rights and modern by a process of ensuring risk assessment trainings are done in compliance with legislation.
- 1.3 Due diligence: The Department Manager is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to complete an online training course during induction.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 **Whistleblowing policy** - the Company encourages all its workers, customers, and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Ethical policy** - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- 2.3 **Corporate Social Responsibility (CSR) Policy** - The Company's CSR policy summarises how we work responsibly with suppliers and local communities.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes:

- building long-standing relationships with suppliers and making clear our expectations of business partners
- evaluating the modern slavery and human trafficking risks of each new supplier
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including:

- requiring all staff to have completed training on modern slavery.
- use of labour monitoring and payroll systems.

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This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. **The Business Director** endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Mrs. Chigozie Nneoma Ibeneme

Position: Business Director

Date: January 15, 2022

Signature:

