

MODERN SLAVERY ACT 2015 – COMPANY STATEMENT

This is a slavery and human trafficking statement for the purposes of section 54 of the Modern Slavery Act 2015. This statement provides information about the structure of the organisation, its business, supply chains, policies, due diligence processes, assessment and management of risk, its effectiveness in ensuring that slavery or human trafficking is not taking place in its supply chains, measured against appropriate performance indicators, and the training available to staff.

INTRODUCTION

We are committed to ensuring that we continue to combat slavery and human trafficking through the application of our rigorous employment and supplier on-boarding procedures.

ORGANISATION'S STRUCTURE

We are a provider of IT infrastructure and project management in various sectors with over 400 employees worldwide and operations in 7 countries, through a number of wholly-owned subsidiary companies.

OUR SUPPLY CHAINS

We predominantly use our own employees to fulfil client assignments; however, we occasionally need to supplement these by using other organisations that have either specialist skills that we lack or to provide additional capacity. All such organisations, if relevant, are subject to a pre-screening test to ensure that its employees are subject to the same level of scrutiny as our own.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. In the main, our Suppliers are UK based. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a dedicated compliance team, which consists of representatives from the following departments:

- Legal
- Compliance and Risk
- Talent management
- Delivery
- Commercial

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Annual review of all corporate responsibility policies, ensuring compliance with the Act
- Maintain robust immigration checks for all employees and contractors
- Annual review of salaries to ensure minimum wage is adopted
- Assess new suppliers to identify risk areas and identify whether additional due diligence is required. Plan steps to address
- Annual review of suppliers to identify risk areas and identify whether additional due diligence is required. Plan steps to address
- Seek assurance from new suppliers that they comply with the Act, seeking annually thereafter
- Review supplier contracts and consider inclusion of obligations to comply with the Act

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Keep abreast of any information updated information and case law connected with the Act and further review policies and processes in order to remain compliant
- Review, update and publish this statement annually

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2018



Roderick Stead
Chief Risk Officer

For and on behalf of PTS Consulting Group Limited

Date: 25th September 2017