

At Giacom, we understand the importance of complying with the Modern Slavery Act 2015 (the “Act”). We have, for several years, taken steps to ensure the requirements of the Act were implemented, not only throughout our business, but throughout our supply chain as well.

Today, as a standalone business, we are committed to running our business responsibly, with the same ethical principles that our customers and suppliers have come to expect. We continue to respect all human rights and encourage the highest possible standards throughout our supply chain. This statement describes our business and supply chain and how we operate them. We explain our current policies and practices and the plans to enhance these in support of the Act.

Beliefs and Principles

We maintain our long-standing commitment not to use or accept forced, bonded or involuntary prison labour or child labour, nor do we demand deposits or hold onto our workers identity papers – or work with businesses that do. We only work with people who believe in the right to work freely.

We respect the right to equal opportunity, freedom of association and collective bargaining. These principles are integral to our approach to Environmental, Social, and Governance (ESG) and integrated with our Corporate Social Responsibility (CSR) programme. To ensure the voices of our team members are heard and to drive continuous improvement in this area, we have appointed an ESG Coordinator to lead our efforts and are actively fostering a collaborative environment for advancing our CSR objectives.

We welcome feedback from our employees and suppliers, including in relation to any suspicion or knowledge of unethical behaviour. We make it easy to report concerns either via their line manager, our Human Resources department or via our Risk and Compliance team. Additionally, we provide an independent whistleblowing service that enables staff to anonymously report concerns, including any for modern slavery or trafficking.

Our Business and Supply Chain

We are a UK based provider of IT, telecommunications, and cloud services employing over 800 employees. The nature of our business requires us to engage with a wide range of suppliers to source items and services including our network and IT hardware through to our waste disposal services. Many of our supplies have their own suppliers which means that we are one part of a complex supply chain. In order to comply with the requirements of the Act, we prioritise our attention on companies that supply high value products or services, or things without which our business could not run.

How We Monitor Compliance

We aim to prevent modern slavery or human trafficking in our business right at the start of our recruitment process. Our recruitment policy is aligned to our principles outlined within our employee handbook and CSR Policy and applies to all people hired regardless of whether this is via our internal recruitment team or through the use of external agencies.

Once people join us, we give our new employees plenty of support, education, and training. All new starters are made aware of our ethical policies which are available through our intranet pages and are readily available to all employees. We have introduced our first ethical code of conduct that outlines our ethical standards for our employees, partners, and suppliers. In the coming months we will roll out that code of conduct to newly acquired companies. Failure to behave in an ethical manner whilst working on behalf of Giacom, in appropriate cases, will result in disciplinary action which could ultimately lead to dismissal.

Although there have been changes to the structure of our teams, our commitment to ensuring the adequate continuity of our compliance monitoring program has been prioritised. In the next twelve months we will place our supply chain under scrutiny and will review the effectiveness of our program and make improvements where appropriate.

Measuring Our Progress

Key Performance Indicators (KPIs) for the Modern Slavery Act are metrics used to measure and track an organisation's progress in combating modern slavery within its operations and supply chains. These KPIs help us assess the effectiveness of our policies, procedures, and due diligence processes in identifying and mitigating the risks of modern slavery. Below is a list of KPI's we use:

- **Onboarding:** All our suppliers are subject to MSA where they confirm they follow the Modern Slavery Act 2015, which is tracked. No business is conducted until this has been confirmed.
- **Supplier Performance:** Giacom manage supplier performance through contract management and performance reviews.
- **Whistleblowing:** Giacom utilises an online whistleblowing platform which allows staff to report serious workplace concerns with the option to provide their name, remain anonymous to Giacom only or remain anonymous completely. Our Compliance team track any potential modern slavery incidents and the processes for handling them.