



## **MODERN SLAVERY ACT STATEMENT**

At Daisy Corporate Services Trading Limited (Daisy) we are committed to running our business responsibly. We strive to maintain high ethical principles and to respect human rights and we do our best to ensure high standards in our supply chain and business.

We have been focused on the rights and wellbeing of the people who work for us for many years and this is the seventh statement we have issued in line with the requirements of the Modern Slavery Act 2015 (the "Act").

In this statement we describe our business and supply chain and how we operate them. We also explain our current policies and practices and the plans that we have to enhance these in light of the Act.

### **Beliefs and principles**

We have a long-standing policy that we will not 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 choose to work freely. We respect the right to equal opportunity, freedom of association and collective bargaining. This is reflected in our Corporate Social Responsibility (CSR) Policy and our commitment to the UN Global Compact. We will continue to encourage key suppliers of Daisy, to adhere to the principles of our CSR Policy.

We welcome our employees speaking up about any unethical behaviour and make it easy for them to do so via either their manager or our Compliance team. Our whistleblowing process allows employees to report any wrongdoing or behaviour they think goes against our standards via our confidential anonymous whistleblowing line.

### **Our business and supply chain**

We are a leading independent provider of IT and communication and related services and have approximately 1,000 employees. We are based in the UK and our customers are individuals, public bodies, charities and companies ranging from international to small business.

We provide six solution areas including Connect, Unified Communications, Modern Workplace, Cloud, Cyber Security and Operational Resilience.

We buy a vast range of things, from network and IT hardware to waste disposal services. Some of these products and services we use in our own business and some we use as part of what we sell to our customers.

Many of our suppliers have their own suppliers. Our supply chain is therefore large and complex. We have prioritised our attention on companies that supply high risk products or services, high value products or services or things without which our business could not run. In 2023/24 we will further scrutinise our supply chain to satisfy ourselves it complies with the requirements of the Act.



We foster long-term relationships with our key partners and proactively avoid making demands that might lead to them violating human rights

### **How we check compliance with our standards**

We perform due diligence on both our colleagues and our supply chain in the following ways.

We aim to prevent modern slavery or human trafficking in our business throughout our recruitment processes. Our recruitment procedures are aligned to our principles in the CSR Policy and applies to all people hired regardless of whether this is via our internal recruitment team or 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 company intranet and are readily available to all employees.

We have mandated our Modern Slavery Training through our Daisy Grow Learning platform which is monitored and subject to reporting. The training has been made part of the mandated in-duction training for new starters.

Since the introduction of the Act we have enhanced our monitoring programme and our Compliance team on related matters. Failure of employees to behave ethically at work will, in appropriate cases, result in disciplinary action which ultimately could lead to dismissal.

The requirements of the Act have been fully incorporated into our HR Policies and Procedures.

Every supplier is required to complete a new supplier form which examines their commitment to the Act requiring proof of documentation. This is audited annually as a minimum. Where a supplier fails to provide and maintain this commitment we will work with them to ensure compliance or not conduct business.

In 2023/24 we will further scrutinise our supply chain and we will review the effectiveness of our programme and make improvements where appropriate.

### **Measuring how we're doing**

In 2023/24 we have, in line with our KPIs, actively encouraged our suppliers, including key suppliers, to agree to the principles of our CSR policy and over 130 have done so – a significant uplift on the previous year. This is now fully in line with our objectives.

This approach remains a core part of our supplier on-boarding process.

We have incorporated Bank Account checks into our New Starter requirements and this continues our positive steps towards eliminating all forms of Modern Slavery within our organisation. This step has, as a consequence, raised awareness in the operational management teams.

For FY 2023 we set ourselves the following key performance indicators:



- All new suppliers will be asked to adhere to the principles within our CSR Policy
- We will review at least 5 of our Peer's Modern Slavery Statements to ensure we are covering all accessible areas and will adopt any Best Practice we feel is relevant
- All new employees will undertake mandatory Modern Slavery Training
- At least one company wide communication on CSR that includes the requirements of the Act

### Results

- 130 new suppliers have been asked to adhere to the principles of our CSR Policy
- 5 Modern Slavery Statements were reviewed
- CSR news including Modern Slavery content is now published within the main company newsletter
- Modern Slavery has been incorporated as an agenda item in our new Social ESG Working Group
- We have identified new initiatives and acted upon them - for example proactively avoiding making demands on our suppliers that might lead to them violating human rights

### KPIs for 2023/24

- Another Tier of existing suppliers will be asked to adhere to the principles within our CSR Policy
- We will review at least 5 additional Peer's Modern Slavery Statements to ensure we are covering all accessible areas and will adopt any Best Practice we feel is relevant
- All new employees will undertake mandatory Modern Slavery Training
- All existing employees will undertake mandatory training on the UK Modern Slavery Act
- At least one company wide communication on CSR that includes the requirements of the Act

This statement applies to Daisy Corporate Services Trading Ltd. and reflects the Daisy Board's formal approval of relevant activities between 1 April 2023 and 31 March 2024

**Lyndsey Charlton, Chief Operating Officer Daisy Corporate Services**

**29th September 2023**