

Modern Slavery Act Statement

At 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 encourage high standards in our supply chain and business.

We have been focussed on the rights and wellbeing of the people who work for us for many years and this is the third 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 continue 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 Policy which applies to all Daisy Group businesses. In 2018/19 we will continue to encourage key suppliers to adopt the principles within it.

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.

Our business and supply chain

We are a leading network independent provider of IT and communication services and have approximately 3,500 employees. We are based in the UK and our customers are individuals, public bodies, charities and companies ranging from international to small business. We sell phone, broadband, mobile, data and business continuity services as well as IT networks.

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. Around 1,200 suppliers sell to us.

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 value products or services, or things without which our business could not run. In 2018/19 we will continue scrutinising our supply chain to satisfy ourselves it complies with the requirements of the Act.

How we check compliance with our standards

We aim to prevent modern slavery or human trafficking in our business right at the start of our recruitment processes. Our recruitment policy is aligned to our principles in the Corporate Social Responsibility 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 at induction. Our policies are hosted

on the intranet and are readily available to all employees. In 2018/19 we will be expanding our employees' knowledge of slavery through new training modules.

Failure of employees to behave ethically at work will, in appropriate cases, result in disciplinary action which ultimately could lead to dismissal depending on the circumstances.

Since the introduction of the Act we have enhanced our monitoring programme and our Compliance team. In 2018/19 we will be placing our supply chain under greater scrutiny and we will review the effectiveness of our programme and make improvements where appropriate.

Measuring how we're doing

In 2017 we completed over 20 risk assessments on our suppliers. We did not undertake any on site audits of suppliers. We have actively encouraged our key suppliers to agree to the principles of our Corporate Social Responsibility process and over 50 have done so. We have now built this into our supplier on-boarding process. Over 100 suppliers have completed our Corporate Social Responsibility questionnaire. We have not delivered further training to the procurement team following the training they received during 2017. We are exploring the adoption of online ethics training modules for relevant teams.

In 2018 we have set ourselves the following key performance indicators:

- 50 additional key suppliers to have agreed to the principles of (or substantially similar with) our Corporate Social Responsibility Policy
- 50 additional suppliers to have completed our Corporate Social Responsibility questionnaire
- 90% of new employees to have received Corporate Social Responsibility training within eight weeks of joining the business
- 90% of employees within procurement to have undertaken Corporate Social Responsibility Supply Chain training

Every year we will report publicly our key performance indicator results. This will include the above KPIs.

In the longer term, we will strive to develop better ways of measuring the effectiveness of the steps we take to manage these risks. We look forward to reporting on our performance in next year's statement.

This statement covers 1 April 2017 to 31 March 2018 and has been approved by the board of Daisy Group Holdings Ltd

Bilal Khan
Head of Compliance