

# Modern Slavery & Human Trafficking Statement

## Introduction

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At Cobweb Solutions Ltd we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken robust steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2021.

## Our business and supply chains

Cobweb is one of the UK's largest cloud solutions providers.

Founded in 1996, we draw on in-depth expertise and our two decades of experience to help businesses achieve their corporate objectives and maintain competitive edge through the deployment of best-of-breed cloud technologies.

We primarily operate in the UK and Ireland, with customers also across Western Europe and the Middle East.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

## Risk assessment

In the past year, we conducted a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services provided by each supplier
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

## Policies

Cobweb operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- **Code of Conduct** - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Purchasing Code** - we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

## Supplier due diligence

Cobweb conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, resellers and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers and resellers that fail to improve their performance in line with our requirements

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

## Awareness

Cobweb has raised awareness of modern slavery issues by sending communications that are focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

## Training

In addition to the awareness programme, Cobweb has rolled out an e-learning course to all employees, which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- The terms and guidance which should be provided to suppliers in relation to slavery policies and controls
- What steps Cobweb will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by Cobweb's anti-slavery policy

This Modern Slavery Act Disclosure Statement is subject to annual review and approval by the Cobweb Board of Directors, or sooner in response to significant changes in Cobweb's business practices or applicable law and regulations.



Michael Frisby, Managing Director