



Modern Slavery and Human Trafficking Statement for the financial year 2019

Introduction

This statement is made on behalf of Primary Tech Service Limited pursuant to the section 54(1) of Modern Slavery Act 2015. The statement provides some background to our organisation and our supply chains. It also sets out the steps we have taken during the financial year ended 31st December 2018.

Our Business

The organisational structure of the business is a privately-owned company that resells IT technology goods, services and solutions to business and public sector customers throughout the UK.

Our Supply Chains

Within our industry there are multiple layers to the supply chain consisting of IT distributors and IT manufacturers. We use our suppliers to fulfil the operations of our organisation.

Due Diligence Processes for Slavery and Human Trafficking

While it is impractical for an organisation to audit and monitor every supplier in its entire supply chain at all levels, it should be possible to identify key vulnerabilities and take a risk-management approach to ethical procurement. As part of the company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of controls undertaken by the supplier. This forms part of the standard requirements of supplier engagement. Written correspondence is requested and provided by each supplier, detailing the systems, procedures and policies in place to combat slavery in its own supply chains. This process is led by our supply chain team, assisted by our legal team.

Our Policies on Slavery and Human Trafficking

We operate several policies and procedures which reflect our commitment to acting properly in all our business relationships and to implementing and enforcing effective systems and controls. They apply to all employees and to anyone engaged on a temporary basis.

The company directors and senior management shall take responsibility for implementing these policies and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and its supply chains.

Our policies which contribute to minimising the risk of modern slavery and human trafficking in our organisation and supply chain are:

- **Anti-slavery policy** – the aim of this policy is to inform employees and others about the issues around exploitation of people
- **Health and Safety policy** - a key aim of which is to ensure the wellbeing of all our employees and anyone else who may be affected by our activities
- **Harassment and Bullying policy** – The purpose of this policy is to ensure that all employees are treated with dignity and respect and free from harassment
- **Risk Management policy** - which is designed to keep all our activities in line with all applicable laws, regulations and codes of governance (including in relation to slavery and human trafficking)
- **Procurement policy** – this sets out guidelines to the Supply Chain team to ensure activities are conducted in a fair, objective and transparent manner and that best practice will be used in the application of ethical standards and in compliance with local, regional, national and international legislation
- **Ethical Purchasing policy** – the purpose of this policy is to promote good labour and environmental standards in the supply chain of goods and services and to protect our reputation
- **Anti-bribery policy** – This policy contains controls required by law to manage risk of fraud, bribery and corruption
- **Whistleblowing policy** – which provides guidance on how to report suspected dangers or wrongdoing in the workplace

Supplier Adherence to our Values and Ethics

The company will strictly not support or deal with any business knowingly involved in slavery or human trafficking. To ensure all those in our supply chain and contractors comply with our values we operate in line with principles of responsible sourcing, including paying employees at the prevailing minimum wage applicable within their relevant county of operations.

Training

We try to ensure that adequate information and training is provided to all our employees, contractors or visitors on all relevant matters. Here are some examples of the information and training we provide:

- All new employees attend a formal induction session which includes training in our policies
- Managers and leaders are provided with a range of training and are assisted by our HR team in

HR-related matters including recruitment, remuneration and employee wellbeing

Our Supply Chain team, assisted by our legal team, routinely seek out information and training to help identify and address risks in both our organisation and supply chain

