

## INTRODUCTION

This annual Slavery and Human Trafficking Statement provides information to supplement our Ethical Trading Policy. In this statement we set out the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place our business or our supply chain.

We include details of our activities, supply chains and the actions we have taken and are taking to ensure that modern slavery is not deliberately or inadvertently supported by us.

This statement will evolve over time, to demonstrate practical progress on how we are tackling the risks and incidence of modern slavery in our operations and supply chains.

## STATEMENT OF COMMITMENT

Data Tech Holdings Ltd are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. This policy applies to all persons who act on our behalf in any capacity, including employees at all levels: directors, consultants, contractors, agency workers, volunteers, interns, business partners and our supply chain.

## OUR BUSINESS STRUCTURE, BUSINESS AND SUPPLY CHAIN

We provide installation of network and cabling infrastructure to a diverse range of clients across many industry sectors, continually adapting and growing to embrace the opportunities of evolving technologies.

We are proud of our history and values and strive to ensure that all our projects are delivered in a manner that upholds and enhances both our and our clients reputation in a socially responsible manner.

Although we primarily work in the UK, we frequently serve our clients throughout the world via three established offices in the UK. We operate via an extensive network of trusted and proven partners and vendors.

We rarely purchase items directly from manufacturers, instead using UK based distributors operating on behalf of global manufacturers.

## POLICIES AND RESPONSIBILITY

The following policies help us to identify and prevent modern slavery in our organisation and are available on the Data Tech website at [www.dtcomms.co.uk](http://www.dtcomms.co.uk):

- Ethical Trading Policy - BMP 005
- Equal Opportunities Policy - HRP 003

All senior staff have responsibility for the enforcement of our policies:

## RISK ASSESSMENTS

The two areas where the greatest risks have been identified are from:

- Equipment and material suppliers
- Contractors and their employees

Although we do not generally purchase materials directly from overseas entities which might contribute a business slavery risk, due diligence is still undertaken. Even though materials are obtained via various UK distributors, the original manufactures which could have manufacturing plants in the UK or abroad are ordinarily global enterprises where Corporate Social Responsibility (CSR) can be assessed and recorded. Regular checks are made on the existence of such CSR undertakings.

All contractors are required to sign a framework agreement that includes a statement of adherence to our modern slavery policy although no direct verification is undertaken.

## **DUE DILIGENCE**

Our business undertakes a range of activities in order to ensure that there is no slavery and human trafficking in the business and supply chains as listed below:

- Key global manufacturers have online checks carried out to verify their CSR credentials and applicable documents are reviewed.
- Contractors are required to sign a framework agreement.

Verification of manufacturers has been recently implemented, although this review is not fully complete. This exercise is a general review and assessment of the organisation concerned.

## **EVALUATING EFFECTIVENESS**

The company turnover has not yet exceeded the £36m threshold, therefore only limited due diligence has been undertaken. A more formal process will be required should this be exceeded, which will include:

- Informing and updating employees about modern slavery and human trafficking.
- Review of key manufacturers and assessment of their Corporate Social Responsibility.
- Creation of records of assessment and database of information collected.
- Inclusion as part of the Annual Management Review

Any supplier who cannot demonstrate adherence to this statement will not be granted approved supplier status.

## **TRAINING AND RAISING AWARENESS OF MODERN SLAVERY AND HUMAN TRAFFICKING ISSUES**

No training has yet been provided to staff due to the relatively low risk to the business. However, awareness briefings will be carried out subject to need.



Bob Jacobs  
Managing Director