



# Modern Slavery and Human Trafficking Statement

## Level 1

SOP049

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## 1 Purpose and Scope

This statement relates to GCI Network Solutions Limited and the GCI Group of companies including Freedom Communications (U.K.) Limited and Blue Chip Data Systems Limited, hereafter known as GCI.

The purpose of the statement is to communicate GCI's commitment to The Modern Slavery Act 2015.

## 2 Modern Slavery and Human Trafficking Statement

### 2.1 Introduction

GCI is dedicated to ensuring that everything we do is ethical and lawful, and that we work in a socially- and environmentally-sustainable way.

GCI has a zero-tolerance approach to both modern slavery and human trafficking whilst providing services to our customers and within our supply chain.

### 2.2 GCI and our supply chain

GCI predominantly sells converged IT solutions and services to businesses. In order to deliver this, GCI purchases equipment, software and services from a wide range of suppliers. Many of these are provided by UK-based companies, in addition to global companies.

To ensure our suppliers and contractors comply with our values, we have in place a Supplier Code of Conduct which must be adhered to. The obligations placed on suppliers and contractors include compliance with the following legislation:

- Child Labour
- Forced Labour
- Freedom of Association and Right to Collective Bargaining
- Compensation and Working Hours
- Discrimination
- Business Continuity Planning
- Improper Payments and Bribery
- Environmental

### 2.3 The control process

GCI conducts regular reviews with all of its suppliers and contractors to ensure they are compliant with all aspects of the Modern Slavery Act 2015. All new suppliers and contractors to GCI must complete a registration process which clearly sets out their approach, handling of this legislation and compliance with the Supplier Code of Conduct.

To ensure GCI's compliance, prior to any member of staff commencing employment (either on a temporary or permanent basis) relevant checks are undertaken to ensure the individual has the legal right to work within the UK. GCI's ongoing compliance includes providing access to modern slavery course modules to all staff at all levels to ensure recognition of any contravention of law relating to modern slavery is dealt with appropriately and efficiently.

GCI audits its own internal processes as a part of its wider compliance management obligations. Any issues identified which contravene modern slavery legislation are dealt with promptly and any corrective and/or preventative measures are put into place as necessary.