

## 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 fourth 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 (CSR) Policy which applies to all Daisy Group businesses. In 2019/20 we will encourage key suppliers of Digital Wholesale Solutions, Allvotec, Daisy Corporate Services, Aurora and Daisy Communications to adhere to the principles of our CSR Policy.

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 and related 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 2019/20 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 CSR 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 which are available through our company intranet and are readily available to all employees. While we did not fully achieve our training objectives in 2018/19, in 2019/20 we will be expanding our employees' knowledge of slavery through our first employee ethics code of conduct.

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 2019/20 we will continue to place our supply chain under scrutiny and we will review the effectiveness of our programme and make improvements where appropriate.

### Measuring how we're doing

In 2018/19 we have, in line with our KPIs, actively encouraged our suppliers, including key suppliers, to agree to the principles of our CSR process and over 30 have done so. While this is less than our objectives it is a result of a reduction in the numbers of new suppliers we have used. This approach remains a core part of our supplier on-boarding process.

In 2019 we have set ourselves the following key performance indicators:

- All new suppliers will be asked to adhere to the principles within our CSR Policy
- 90% of employees to have undertaken CSR training or attended a CSR briefing
- At least one company wide communication on CSR that includes the requirements of the Act

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 2018 to 31 March 2019, applies to Digital Wholesale Solutions, Allvotec, Daisy Corporate Services, Aurora and Daisy Communications and has been approved by the board.

**Bilal Khan**  
**Head of Compliance**