

Modern Slavery Act Statement

At Digital Wholesale Solutions (DWS), we understand the importance of complying with the Modern Slavery Act 2015 (the “Act”). We have, for several years, taken steps to ensure the requirements of the Act were implemented, not only throughout our business, but throughout our supply chain as well.

Today, as a standalone business, we are committed to running our business responsibly, with the same ethical principles that our customers and suppliers have come to expect. We continue to respect all human rights and encourage the highest possible standards throughout our supply chain. This statement describes our business and supply chain and how we operate them. We explain our current policies and practices and the plans that we have to continue to enhance these in support of the Act.

Beliefs and Principles

We maintain our long-standing commitment not to 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 believe in the right 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. In the next twelve months we will encourage key suppliers of DWS to adhere to the principles of our CSR policy. We have created a CSR committee where views of our teams members are heard and we strive to make further advances in the area.

We welcome feedback from our employees and suppliers, including in relation to any suspicion or knowledge of unethical behaviour. We make it easy to report concerns either via their line manager, our Human Resources department or via our Compliance team. Additionally, we provide a dedicated whistleblowing service which allows the anonymous reporting of concerns, wrongdoing or behaviour that goes against our standards.

Our Business and Supply Chain

We are a UK based provider of telecommunications and technology services employing over 500 employees. The nature of our business requires us to engage with a wide range of suppliers to source items and services including our network and IT hardware through to our waste disposal services. Many of our suppliers have their own suppliers which means that we are one part of a complex supply chain. In order to comply with the requirements of the Act, we prioritise our attention on companies that supply high value products or services, or things without which our business could not run.

How We Monitor Compliance

We aim to prevent modern slavery or human trafficking in our business right at the start of our recruitment process. Our recruitment policy is aligned to our principles outlined within our CSR Policy and applies to all people hired regardless of whether this is via our internal recruitment team or through 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 intranet pages and are readily available to all employees. Although we did not achieve all of our training objectives, we have introduced our first ethical code of conduct that outlines our ethical standards for our employees, partners and suppliers. Failure to behave in an ethical manner whilst working on behalf of DWS, in appropriate cases, will result in disciplinary action which could ultimately lead to dismissal.

Although there have been changes to the structure of our teams, our commitment to ensuring the adequate continuity of our compliance monitoring program has been prioritised. In the next twelve months we will continue to place our supply chain under scrutiny and will review the effectiveness of our program and make improvements where appropriate.

Measuring Our Progress

Throughout 2020/21 our business finalised a period of transition, moving from the Daisy Group structure and becoming a standalone entity. This change brings an exciting opportunity for us to review how we have embedded the requirements of the Act and to identify new opportunities to improve.

In 2020/21 we achieved the following objectives:

- Review, streamline and publish a standalone DWS CSR Policy
- Finalise and publish our Ethics Code of Conduct

In 2021/22 we aim to:

- Introduce periodic supplier questionnaires in relation to confirming adherence to the requirements of the Act
- Increase our employee training in respect of CSR

We will publicly report on our progress against these objectives in our 2021/22 statement. In the last year we have continued to ensure that our suppliers are bound by controls in respect of all applicable legislation, including the Modern Slavery Act. In the longer term, we will strive to develop better ways of measuring the effectiveness of the steps we take to manage the risks associated with Modern Slavery.

This statement is applicable from 1 October 2021 to 30 September 2022.