

Modern Slavery and Human Trafficking Policy Statement

1. Introduction

Modern Slavery is an indefensible violation of basic human rights and eSynergy recognizes we have a moral responsibility to prevent slavery and human trafficking in our business activities and to require our supply chain to do the same.

We only seek to engage with reputable organisations and are keen to work with our employees, partners, associates and end clients to do whatever we can to help eradicate this practice in the United Kingdom.

2. Our Business

eSynergy Solutions Limited is a challenger consultancy supplying specialist IT teams and services to our clients in the public and private sectors via our communities and associates.

We have our head office in London, England and operate primarily in the United Kingdom, with some overseas travel to Europe being undertaken by our employees and associates as and when required.

3. Our Supply Chain

eSynergy are committed to acting ethically and responsibly and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

We respect the rights of individuals and the communities in which they live and we require that our suppliers comply with the standards of conduct that we expect of any company that we do business with.

Our supply chain includes the below who operate in various sectors within the UK and have a requirement for skilled services and/or resources:

- Consultancy Companies
- System Integrators
- End-Clients including Public Sector bodies, Financial Service and Technology industries.

4. Our Policies

The following eSynergy policies and procedures reflect our commitment to acting ethically and with integrity in all our business relationships and help us to identify the risks and steps needed to prevent slavery and human trafficking in our operations:

- Modern Slavery and Human Trafficking Policy
- Whistleblowing Policy

- Anti-Bribery and Corruption Policy
- Right to Work in the UK procedure

Awareness training is provided for all main board members and any other staff in relevant and appropriate roles.

5. Our Risk Management

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our supply chains.

As part of our initiative to identify and mitigate risk we:

- Assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains
- Review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.
- Protect whistle blowers
- Undertake 'Right to Work' Checks process for all overseas nationals looking to secure work in the UK without discriminating against any individual on the basis of their race, nationality, caste, creed or colour
- ensure that individuals are not under undue influence from any third parties to accept placements and ensure that individuals are entering into contracts of their own freewill

6. Due Diligence

eSynergy will not support or engage with any business knowingly involved in human trafficking or exploitation and we make it clear that our supply chains and partners are expected to comply with all applicable laws and obligations.

eSynergy have always had a robust and detailed quality assurance procedure to screen our new employees and our potential associates to ensure that we can confirm their identities and that they are legally entitled and willing to work in the UK and which includes ongoing monitoring of permits and working visas.

Our most recent review has not identified any significant risks of modern slavery, forced labour, or human trafficking in our business or in our supply chain.

However, we will continue to be alert to the potential for problems and we are currently undertaking the following:

- Updating all our contractual documentation with suppliers to include heightened requirements for them to comply with all applicable laws and standards which relate to the Modern Slavery Act;

- Expect our suppliers to have suitable policies and processes in place within their own businesses to prevent child labour, modern slavery and human trafficking and to cascade those policies to their own suppliers;
- Obliging suppliers to report to us if they are aware of or suspect slavery or human trafficking in a supply chain connected to any of our contracts;
- Reserving the right for us to terminate the contract at any time should any instances of modern slavery come to light.

7. Our Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide ongoing training to our staff. Training is also provided to all new employees to ensure they are aware of our stance on preventing slavery and human trafficking within the businesses and supply chains and how to identify if someone is being trafficked.

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business we provide training to all members of staff and this has been incorporated into our induction programme.

8. Board Approval

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking Policy Statement for the financial year ending 31st March 2020.

It has been approved by the Board of Directors, who will review and update it annually.