

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

telent Technology Services Limited

Introduction

This statement sets out our actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business and supply chains. This statement relates to our actions and activities during the financial year 1st April 2018 to 31st March 2019. As part of the telecommunications sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Organisational Structure

We are a provider of network and communication services in a variety of industries from telecommunications and transport, to utilities and the emergency services. We are a subsidiary of telent Limited, as is our sister recruitment company TSS Solutions Limited. We have approximately 2,200 employees and operate in the UK and Ireland. We have reported annual revenue of approximately £550 million.

Our Business

Our business covers four main areas of activity:

Rail - We have over 30 years' experience of delivering and maintaining railway communications systems which includes systems integration, consultancy, design, project delivery and asset management for all rail communication systems.

Traffic - We offer a wide range of intelligent traffic solutions to local and national bodies using our expert consultancy, systems integration capability and specialist traffic equipment and maintenance knowledge.

Telecoms - We provide innovative telecoms solutions to ensure that networks and systems, new or old, work to their optimum performance. We build, maintain and recover the external infrastructure to connect homes, premises and telephone exchanges together.

Emergency Services - We use our extensive technological expertise to help the police, ambulance and fire services across the UK with their mission critical systems so that they are able to respond at speed, reducing costs, but never at the expense of quality.

Our Supply Chain

We have a supply base of around 4000 suppliers, the majority of which are based in the UK and are geographically aligned to projects, supporting our ethos of local support. We use our suppliers (including overseas suppliers where required) to provide:

- products ranging from low value commodities to high value innovative equipment;
- personnel ranging from low-skilled workers to strategically skilled engineers; and

- services ranging from simple, short duration, small value to complex, longer duration, high value.

Our Anti-Slavery Policy

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our internal and external Anti-Slavery Policies reflect 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 in our supply chains. Our external Anti-Slavery Policy which our suppliers must comply with can be found at <https://telent.com/about/compliance-statements>.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, we undertake due diligence when taking on new suppliers and regularly review existing suppliers. This includes:

- broadly mapping the supply chain to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier via a pre-qualification questionnaire and reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- ensuring that all internal processes are being adhered to for example ensuring that personnel provided by suppliers have a right to work in the UK, ensuring that we do not sponsor new migrants into the UK, ensuring that limited company contractors are paid into verified company bank accounts and ensuring that suppliers of personnel do not use off-shore payment solutions;
- conducting on-site supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where a supplier is considered to be higher risk; and
- where violations are identified, supporting a supplier to implement a corrective action plan with the aim of resolving violations within an agreed time period, assisting to improve a suppliers' practices by sharing best in class practices within an open forum and invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct which may include the termination of the business relationship.

We have in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking. To ensure that all those in our supply chain comply with our values, we have implemented processes to:

- clearly communicate our expectations to our supply chain in respect of sustainability, anti-corruption and bribery and ethical procurement;

- encourage our suppliers to cascade a similar process and expectation within their own business and supply chain;
- ensure adherence to our policies at supplier selection, on-boarding, risk analysis, performance measurement and continual assessment; and
- ensure that adherence to our policies is a contractual obligation in our agreements with suppliers.

We have a committed compliance team, which includes stakeholders from the following departments:

- Legal;
- Human Resources;
- TSS Solutions; and
- Procurement and Supply Chain.

Awareness Training

We have implemented an awareness training programme for our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

Monitoring Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

Target	Measure
100%	New staff are inducted on our Anti-Slavery Policy
100%	Suppliers with a turnover above £36 million requested to provide us with a copy of their Modern Slavery and Human Trafficking Statement
100%	'High risk'* suppliers issued with our Anti-Slavery Policy and requested to provide written confirmation that they will comply

*We consider existing suppliers and new suppliers of personnel and existing and new overseas suppliers as potentially 'high risk' areas in respect of modern slavery within our organisation.

Further Steps

In addition to pursuing the Key Performance Indicators above, we will:

- Continue to develop an anti-slavery training and awareness programme to combat slavery and human trafficking;
- Review our Key Performance Indicators to ensure that they remain effective and suitable;
- Implement a checklist for our overseas suppliers;
- Request that "high risk" suppliers not only comply with our Anti-Slavery Policy but develop their own; and
- Deliver training to new subcontractor operatives working on external telecoms infrastructure projects.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2019.

This statement has been approved by our board, who will review and update it annually.

John Kimpton
Finance Director

Date: 30/09/2019