MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

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 2016 to 31st March 2017. 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 the parent company of telent Technology Services Limited and TSS Solutions Limited. The group has approximately 1700 employees and operates in the UK and Ireland. We have an annual revenue of approximately £400 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.

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; and
- personnel ranging from low-skilled workers to strategically skilled engineers.

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 here [link to be inserted].

**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 offshore 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 and Commercial
• Human Resources; and
• Procurement.

**Awareness 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 shall implement an awareness training programme for our staff.

**Our Effectiveness in Combating Slavery and Human Trafficking**

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

• We shall ensure that 100% of all new employees are inducted on our Anti-Slavery policy and that they sign an acknowledgement in respect of this;
• We shall complete a comprehensive review of our existing supply chain by December 2017;
• We shall request from 100% of existing and new suppliers with a turnover above £36 million a copy of their Modern Slavery and Human Trafficking Statement;
• 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. With this focus in mind we shall issue our Anti-Slavery policy to 100% of these particular suppliers and request signed confirmation from each of these suppliers that they manage their business in the required manner and that they shall comply with our Anti-Slavery Policy.

**Further Steps**

In addition to pursuing the Key Performance Indicators above, we intend to develop an Anti-Slavery training and awareness programme as a further step to combat slavery and human trafficking.

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 2017.

This statement has been approved by telent’s Board, who will review and update it annually.

**Mark Plato**
**Chief Executive Officer**

**Date:** 30/09/2017