

SLAVERY AND HUMAN TRAFFICKING STATEMENT

PUBLIC

Secura Hosting Ltd

21/11/2019

This Secura Slavery and Human Trafficking Statement is part of the Node4 Group Policy.

SLAVERY AND HUMAN TRAFFICKING STATEMENT

Since the implementation of The Modern Slavery Act, the UK has seen public examples of UK businesses complicit in human rights abuses. Within this statement, we describe the steps taken to address human rights and modern slavery within our supply chain.

BUSINESS OVERVIEW

Node4 launched in 2004, and since then, we have expanded rapidly, offering comprehensive IT and communication solutions to businesses.

We are committed to respecting and upholding the human rights of our people and all other individuals we conduct business with, through our supply chain, directly or indirectly in line with the UN Guiding Principles on Business and Human Rights.

Node4 Operations consist of:

- > c.300 employees
- > Revenue c.£46m (Financial Year ending March-19)
- > Supply chain c.400 suppliers (Financial Year ending March-19)
- > c. £21m supplier spend (Financial Year ending March-19)

POLICIES AND GOVERNANCE

Node4 has in place a Slavery and Human Trafficking Policy since 2017. We are committed to acting ethically and with integrity in all our business relationships in order to prevent or mitigate any slavery, and human trafficking incidents in our business. This statement is an expression from the top demonstrating our approach to human rights through company policy, due diligence, training and awareness, risk assessment and management of supply chains, corporate and social responsibility and compliance.

Node4's operational procurement focuses on services that are delivered to our offices (such as security, cleaning, catering, maintenance) and the purchase of IT services software and hardware to enable us to provide a vast range of IT services to our customers. The 'Supplier Onboarding Process' documents Node4's expectation to suppliers to confirm that they intend to comply with the law and that it is their responsibility to ensure that their employees, suppliers and other third parties are assessed accordingly.

DUE DILIGENCE

Node4 communicates our expectations to employees and suppliers that Slavery and Human Trafficking is an unacceptable practice within our supply chain.

Our principal asset is our people and we have, therefore, created a working environment that is safe, fair and inclusive and seeks to support their wellbeing and learning.

We seek to minimise the risk of human rights infringements in our supply chain by carefully evaluating suppliers and their commitment and due diligence to ensure that they also comply with the law during the 'Supplier Onboarding Process' and ad-hoc supplier audits.

RISK ASSESSMENT AND MANAGEMENT

Node4 has a risk-based methodology in place to check whether its suppliers comply with The Modern Slavery Act.

Human rights and modern slavery risks are assessed as low given the nature of our 'Well Known' supplier base and industry sectors they operate in, and our focus on the UK market where risks for UK employees are lower given the national legislative context and the robust policies and processes we have in place throughout our business. Nevertheless, we recognise that specific jobs may be more vulnerable and as such due diligence should be carried out by Node4 during the 'Supplier Onboarding Process'.

The procurement of IT goods and services are with suppliers that are 'well-known' and have strong ethical, corporate and social responsibility. Due Diligence has been completed by the Compliance Team to ensure that these larger suppliers such as BT, Virgin, KCOM etc. comply with the law and have adequate measures in place to uphold human rights.

TRAINING

The delivery of our human rights and modern slavery program is dependent on key personnel having a good understanding of the key issues, the legislative requirements of our business and our approach to risk identification and management.

To ensure a level of understanding of the risks of modern slavery and human trafficking we ask all our employees to attest in writing that they understand Node4's company values on an annual basis; that slavery and human trafficking is not acceptable in our business.

EFFECTIVENESS OF KPI'S

The effectiveness of Node4's approach to ensuring Slavery and Human Trafficking is not taking place in our business or supply chains can be measured via Node4 supply chain Risk Assessment, and the due diligence carried out independently on 'well known' third-party suppliers.

This statement was approved by the Board of Node4 Limited for the Financial Year 2019 on behalf of its members and is signed by:



Andy Gilbert
NODE4 DIRECTOR