

MODERN SLAVERY POLICY

Abstract



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1 Introduction

The Modern Slavery Act 2015 requires certain employers to publish an annual statement, setting out the steps they have taken to prevent slavery or human trafficking in their supply chain. We are not currently required by law to publish a statement but have chosen to publish our policy to demonstrate our commitment to promoting ethical business practices and policies that prevent workers from being abused or exploited, both within our business and within our supply chain.

Whilst the nature of our services creates a low-risk supply chain in relation to slavery and human trafficking, we still believe it is important to maintain a zero-tolerance approach to modern slavery. We are aware of the forms of modern slavery and avoid all aspects in our business activity and supply chain.

2 Our Business

PowerONPlatforms aims to help companies simplify their IT operations and improve user experience through modern IT deployment and delivery approaches. Our people are primarily directly employed by PowerON, with some consultants used as additional resource. We do not manufacture or resell physical products, which significantly simplifies our supply chain.

Anyone who works for PowerON, whether as an employee or a consultant, has a written agreement which sets out the terms and conditions of their engagement with us, including rates of pay and work requirements. We always pay the living wage or higher, and the technical expertise required to deliver our services means that the risk of modern slavery occurring in this supply chain is minimal to non-existent.

We work with a limited number of technology suppliers, and in these cases, we validate that their Modern Slavery Statement is in place as required by law, and that it does not highlight any concerns.

3 Our Principles

On the broader question of ethics and conduct, we have policies in place both for our suppliers and employees which cover ethics, standards of behaviour, and compliance with relevant legislation. These set out our expectation that our people will take personal responsibility for doing the right thing, and the consequences should they choose not to.

4 Recognising Modern Slavery

Despite the nature of our business, we do not want to be complacent, and ensure that our employees understand what modern slavery is.

The definitions of modern slavery include:

- Slavery or servitude: where an individual is deprived of their freedom, due to another behaving as if they own the individual. There may be an obligation to provide services that is imposed by the use of coercion, where the individual is generally required to live on another person's property and has no ability to leave or change the situation.
- Forced or compulsory labour: where work or service is exacted from any person under the menace of any penalty, and for which the person has not offered him/herself voluntarily.
- Human trafficking: where a person arranges or facilitates the travel of another person with a view to that person being exploited; the person who is transported may or may not have agreed to the travel.

- Child labour: children under 12 involved in any economic activity or children aged 12-14 involved in more than “light work” are considered to be involved in child labour. This is likely to constitute modern slavery where children are sold/trafficked; where they are involved in prostitution or pornography; where they are procured or offered for use in illicit activities such as drug trafficking; or any work which by its nature or circumstances is likely to harm the health, safety or morals of children.

We do not currently operate compulsory training on modern slavery, due to the low level of risk.

5 Responsibility

This policy is reviewed and signed off by our Chief Executive Officer, who takes overall responsibility for ensuring that our zero-tolerance approach is maintained.

Our Supplier Onboarding Policy ensures that new suppliers are assessed and screened before we commit to working with them.

All employees are responsible for working within these policies and raising any issues they identify.