

Slavery and Human Trafficking

Statement

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Slavery and Human Trafficking statement

Since the implementation of the Modern Slavery Act 2015 the UK has seen public examples of UK businesses complicit in human rights abuses. Within this statement, we describe the steps taken by Node4 to address human rights and modern slavery within our supply chain.

Organisation overview and structure

Node4, launched in 2004, has rapidly grown, providing comprehensive IT and communication solutions to businesses. Upholding the UN Guiding Principles on Business and Human Rights, we respect human rights across our operations and supply chain.

Our operations include 453 employees, a revenue of £93,800,800, and 468 active suppliers with a spend of £54,900.

Our services encompass:

- Cloud Services: Including public, private and hybrid cloud hosting.
- Data Centre Services: Including colocation services, disaster recovery, and business continuity solutions.
- · Connectivity: Including broadband, leased lines, and MPLS networks.
- Communication and Collaboration: Including unified communications solutions, VoIP and collaboration tools.
- Managed Services: Including IT support, network management, and cybersecurity services.
- Professional Services: Including consultancy and project management services.

We remain committed to respecting and upholding the human rights of all individuals we interact with, directly or indirectly, in alignment with the United Nations Guiding Principles

Policies and Governance

Since 2017, Node4 has implemented a Slavery and Human Trafficking Policy, reflecting our commitment to ethical conduct and integrity in all our business relationships, with the aim to prevent or mitigate any incidents of slavery and human trafficking in our operations. This statement, endorsed by our Executive Board, outlines our approach to human rights, encompassing company policy, due diligence, training and awareness, risk assessment, supply chain management, corporate social responsibility, and compliance.

Our operational procurement primarily involves services delivered to our offices, such as security, cleaning, catering, and maintenance, as well as the procurement of IT services, software, and hardware, enabling us to offer a wide array of IT services to our customers. Our 'Supplier Onboarding Process' outlines Node4's expectations for our suppliers, requiring them to comply with the law and to ensure that their employees, suppliers, and other third parties.

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, 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 is 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 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 comprehensive understanding of the risks of modern slavery and human trafficking, we require all our employees to affirm their understanding of Node4's company values, including our firm stance that slavery and human trafficking are unacceptable in our business. We provide training to all employees on these issues, ensuring that this important information is included in the induction process for new starters. A record of this awareness and training is maintained for all employees as part of our commitment to transparency and accountability.

Effectiveness of KPI's

The effectiveness of Node4's approach to ensuring that slavery and human trafficking are not taking place in our business or supply chains can be measured through our supply chain Risk Assessment, and the due diligence carried out independently on 'well known' third-party suppliers. In addition, the training record of all employees being made aware of the issues of modern slavery and human trafficking also serves as a key measure of our commitment and vigilance in this area.

NAME: Paul Bryce

ROLE: Director

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