

# Modern slavery and human trafficking statement for County Broadband Ltd

## Introduction

This statement sets out County Broadband Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2016 to 31 March 2017.

As part of the telecommunications sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Organisational structure and supply chains

This statement covers the activities of County Broadband Ltd:

- Broadband connectivity and related value added services to customers predominantly based in Essex and Suffolk
- In its supply chain it uses subcontractors to install and support its services and telecommunication equipment manufacturers that supply the electronic equipment we need to deliver our services. Its telecommunications networks interconnect to other networks as part of its supply chain.

### *Countries of operation and supply*

The organisation currently operates and supplies its services solely from the United Kingdom.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- We operate out of a single office in Aldham. From here County Broadband's management is able to provide optimum supervision of its staff.
- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour;
  - With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the

next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

#### *High-risk activities*

- We believe we have no activities in our business that are at high risk of slavery or human trafficking.

#### *Responsibility*

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Lloyd Felton - MD
- **Risk assessments:** Gill Reading – Office Manager
- **Investigations/due diligence:** Gill Reading – Office Manager
- **Training & Policy:** We share this process with the rest of our employees upon commencement of employment and annually thereafter when this process is reviewed to highlight that it is each and every one's responsibility to understand and highlight any acts of slavery and human trafficking in our supply chain to County Broadband's management.
- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can post their concerns in confidence and anonymously to Gill Reading who will investigate the concern.
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

- **Agency worker's policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

### **Due diligence**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- conducting supplier audits or assessments through our organisation's own auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through our auditor and requiring them to implement action plans.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

### **Board approval**

This statement has been approved by the organisation's board of directors/members, who will review and update it annually.

### **Signature:**

#### **Name:**

Lloyd Felton

#### **Date:**

05/08/2016