



european  
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**EUROPEAN ELECTRONIQUE LIMITED**

Modern Slavery and Human Trafficking Statement



## 1. Introduction

This statement sets down European Electronique's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place, with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

## 2. Our Business

European Electronique is one of the UK's leading end-to-end technology solutions providers, with over 30 years' experience. Our 150-strong team of friendly experts are always on hand to offer advice and assistance.

We offer an extensive portfolio of products and professional services – everything from hardware and software, IT consultancy and network design and implementation, through to project management and outstanding service and support – to give our clients easy access to a complete range of integrated solutions through a single experienced IT partner.

We have two offices in the UK - Eynsham, Oxford and Manchester, with no offices located outside the UK.

Annual turnover 2020-2021 was circa £73,000,000.00

## 3. Supply Chain

Our business relationship with our existing suppliers has been long standing and has been a business partnership which has grown and expanded, due to ongoing close liaisons between directors and owners.

As a company, we undertake various due diligence checks when looking to embrace new relations with either a new supplier or contractor, in the form of i.e. Management of Contractors Form completed, incorporating H&S, ISO, DBS etc.

## 4. Responsibility for the Policy

The Board of Directors have overall responsibility in ensuring that both the Company and its staff comply and adhere to the Company's anti-slavery practices.

The HR Manager has day-to-day responsibility for:

- Creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting to the needs of the Company.
- Due diligence in relation to known or suspected instances of modern slavery and human trafficking.

## 5. Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company has included our Anti-Slavery Policy on our Company Information Centre and referenced within the Employee Handbook,



for all employee's direct awareness.

## **6. Policies**

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Whistleblowing Policy – the Company encourages all its workers, customers and other business partners to report any concerns to its direct activities or its supply chains
- Code of Conduct Policy – The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company
- Corporate Social Responsibility (CSR) Policy – The Company's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

## **7. Remedy for victims**

Referral for potential adult victims is subject to the individual's consent and European Electronique will work with the National Referral Mechanism to support any potential victims to receive Government-funded support and/or European Electronique support provided on a case-by-case basis.

## **8. Due Diligence Processes for Slavery and Human Trafficking**

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fails to perform in line with our policy, including the termination of the business relationship.

## **9. Annual Statement**

European Electronique will review the companies Slavery and Human Trafficking statement on an annual basis and updates will be published in a revised statement listing all changes. The policy review will be conducted in accordance to our Continuous Improvement Policy.

## **10. Statement updates and progress**



Proposals from Statement	Progress on Proposals
Develop a communication plan to ensure our suppliers, staff and agents are aware of European Electronique obligations in relation to Modern Slavery and informing them about the Modern Slavery Helpline.	We continue to include within our communications to sub-contractors, distributors and vendors communications regarding Modern Slavery.
Review of audit and compliance.	We reviewed our standard form procurement contracts and believe our 'applicable laws' clause covers breaches of Modern Slavery Act. Our procurement process has also been amended to take account of Modern Slavery Act. All suppliers must confirm that they comply with their obligations under the Modern Slavery Act and provide a copy of their Modern Slavery Act Statement.

### 11. Ongoing commitments to tackle modern slavery

As part of our initiative to identify and mitigate risk throughout 2021/22 we are committed to:

- Improve the due diligence assessment for onboarding new suppliers to our systems
- Review our supply base and revise our supplier management processes
- Raise awareness of Modern Slavery across our subcontract and supply base
- Raise awareness of Modern Slavery within the company, our suppliers and subcontractors.
- Educate staff on spotting signs of Modern Slavery.

### 12. Reporting and Governance

If a European Electronique employee or subcontractor working on our behalf suspects or identifies a case of modern slavery, we advise them to report it to the police immediately on 101. Where any potential victims are in immediate danger, we advise use of the standard 999 emergency number.

European Electronique promotes an ethics (whistle-blower) our company Ethics Policy, which is supplied to all employees, suppliers, clients and members of the public. This may be used to report any concerns or suspicions of abuse and modern slavery within our operations or of those within our supply chain.

European Electronique's board of directors is fully supportive of taking steps to ensure that no modern slavery or trafficking occurs in European Electronique's operations or

supply chain. European Electronique has appointed Dee Hoey as Human Resources Manager to lead the Company's response to modern slavery.

Dee Hoey will report any suspected or actual cases of slavery to the European Electronique board of directors and table an annual review of the company's modern slavery processes and activities as part of our Quality Management review process.

This Modern Slavery and Human Trafficking Statement will be updated as necessary in response to any ethical, regulatory or legal requirement. The Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Deirdre Hoey

Position: HR Manager

Date: 25<sup>th</sup> May 2022

Signature:



### **Issue History**

Issue	Date	Comment	Approved by
1	31/3/2019	New Issue	Dee Hoey
2	31/5/2020	Changed – HR Advisor to HR Manager; Company Intranet to Company Information Centre; Proposals	Dee Hoey
3	17/05/2021	Annual update to Policy	Dee Hoey