

Modern slavery and human trafficking



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Introduction

This statement sets out ESP'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 chain.

As a provider of IT services across the globe, ESP recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

ESP is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chain is free from slavery and human trafficking.

Organisational structure and supply chains

ESP provides tailored IT support services to organisations across the globe. We rely on partner companies to extend our reach into countries where we do not have a direct presence, or that presence is limited to specific regions within a country.

ESP provides services to our customers in over 150 countries.

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:

- ESP directly provides the service – very low risk
- ESP uses the services of a staffing company to provide staff to deliver the service – low risk
- Supplier provides goods only – low risk
- Supplier provides services to ESP – medium risk
- Supplier provides services on behalf of ESP – medium risk.
- Supplier uses an additional supplier to provide services on behalf of ESP - high risk.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

ESP subcontracts services to a supplier, who then subcontracts further to another company and either protects the identity of the other company, or doesn't disclose the extension of the supply chain to ESP.

Responsibility

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

- Policies: The Board is responsible to creating, authorising and reviewing the policy.
- Risk assessments: The Partner Management team will be responsible for auditing our Suppliers. HR will be responsible for ensuring direct and indirect staff of ESP are treated fairly.
- Investigations/due diligence: Initial identification and investigation of suspected modern slavery will be made by the Partner Management Team, with unresolved matters escalated to the Board.
- Training: Modern Slavery awareness training through Engage in Learning is mandated for the following departments: All managers, Partner Management, Implementation Project and Transition Management, Service Delivery, HR (Identified Staff).

Relevant policies

ESP operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** - ESP encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, ESP. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. ESP's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** - ESP's code makes clear to employees the actions and behaviour expected of them when representing ESP. ESP strives to maintain the highest standards of employee conduct and ethical behaviour when delivering its services and managing its supply chain.
- **Supplier code of conduct** - ESP 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. ESP works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of ESP's supplier code of conduct will lead to the termination of the business relationship

Due diligence

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

- mapping the supply chain broadly to assess particular service or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier through the completion of the relevant questionnaire;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through our Partner Team, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- refer concerns about Suppliers to the Board;
- 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.

Performance indicators

ESP has reviewed its key performance indicators (KPIs). As a result, ESP is:

- requiring all Identified Staff to have completed training on modern slavery by 31 Jan 2018 and then each new joiner within 3 months of their start date;
- developing a system for supply chain verification which is expected to be in place by 31 Mar 2018, whereby ESP evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains expected to be completed by 31 Mar 2018, whereby ESP evaluates all existing suppliers.

Training

ESP requires all Identified Staff within ESP to complete training on modern slavery as a module within ESP's Engage in Learning programme.

ESP's modern slavery training covers:

- Understand the scale of Modern Slavery
- Your responsibilities under the Modern Slavery Act 2015
- What is Modern Slavery
- How to spot the signs of Modern Slavery
- How to report Modern Slavery

Awareness-raising programme

As well as training staff, ESP has raised awareness of modern slavery issues by distributing email flyers to staff.

The flyers explain to staff:

- the basic facts;
- what modern slavery is;
- how to identify a potential victim;
- what they should do if they suspect a co-worker is a victim of modern slavery.

Review

Effective date: 04 Dec 2017

Planned next review date: 03 Dec 2018