

Modern Slavery Act Statement 2020/21

At Daisy Communications Ltd, we understand the importance of complying with the Modern Slavery Act 2015 (the “Act”). Previously, as part of the wider Daisy Group, we took steps to ensure the requirements of the Act were implemented, not only throughout our business, but throughout our supply chain as well.

We continue to be committed to running our business responsibly and with the same ethical principles that our customers and suppliers have come to expect. We continue to respect all human rights and encourage the highest possible standards throughout our supply chain.

This statement describes our business and supply chain and how we operate them. We explain our current policies and practices and the plans that we have to continue to enhance these in support of the Act.

Beliefs and Principles

We maintain our long-standing commitment to not use or accept forced, bonded or involuntary prison labour or child labour, nor do we demand deposits or hold onto our workers identity papers – or work with businesses that do. We only work with people who believe in the right to work freely.

We respect the right to equal opportunity, freedom of association and collective bargaining. This is reflected in our Corporate Social Responsibility (CSR) Policy. In 2021/22 we will continue to encourage key suppliers of Daisy Communications Ltd to adhere to the principles of our CSR policy.

We welcome feedback from our employees and suppliers, including in relation to any suspicion or knowledge of unethical behaviour. We make it easy to report concerns either via their line manager, our Human Resources department or via our Compliance team. Additionally, we provide a dedicated whistleblowing service which allows the anonymous reporting of concerns, wrongdoing or behaviour that goes against our standards.

Given difficulties posed by the COVID-19 pandemic, plans to publish and implement a Code of Conduct were delayed. A draft of this document is under review with a new aim to have this published in Q3 of FY21/22.

Our Business and Supply Chain

We are a UK based independent provider of Communications, IT and related products and services and employ approximately 500 employees. Our customers are individuals, public bodies, charities, and businesses ranging from sole traders through to SME250. Our products include lines, calls, mobiles, broadband and telephone systems.

The nature of our business requires us to engage with a wide range of suppliers to source items and services including our network and IT hardware through to our waste disposal services. Many of our supplies have their own suppliers meaning that we are one part of a complex supply chain. In order to comply with the

requirements of the Act, we prioritise our attention on companies that supply high value products or services, things without which our business could not run.

How We Monitor Compliance

We aim to prevent modern slavery or human trafficking in our business right at the start of our recruitment process. Our recruitment policy is aligned to principles outlined within our CSR Policy and applies to all people hired regardless of whether this is via our internal recruitment team or through the use of external agencies.

Once people join us, we give new employees plenty of support, education, and training. All new starters are made aware of our ethical policies which are available through our intranet pages and are readily available to all employees. Failure to behave in an ethical manner whilst working on behalf of Daisy Communications, in appropriate cases, will result in disciplinary action which could ultimately lead to dismissal.

Throughout FY20/21 our commitment to ensuring the adequate continuity of our compliance monitoring program has been prioritised including the introduction of Anti-Bribery and Corruption training to all existing staff and within the induction process for all new starters. To date, 99% of our employees have successfully completed this training. In 2021/22 we will continue to place our supply chain under scrutiny and will review the effectiveness of our program and make improvements where appropriate.

Measuring Our Progress

Throughout FY20/21 our business continued work needed to effectively separate from the existing Daisy Group structure and becoming a successful standalone entity. Although this work, and the limiting factors associated with the pandemic, brought additional complexity, we successfully completed two of the three objectives outlined in our previous statement. This includes the review and publication of a standalone Daisy Communications CSR policy and the introduction of periodic supplier questionnaires in relation to confirming adherence to the requirements of the Act.

In 2021/22 we have set ourselves the following objectives:

- Finalise and publish our Ethics Code of Conduct
- Introduce periodic supplier questionnaires in relation to confirming adherence to the requirements of the Act.
- Maintain 100% completion of Anti-Bribery and Corruption training across the business.

We will publicly report on our progress against these objectives in our 2021/22 statement. In the longer term, we will strive to develop better ways of measuring the effectiveness of the steps we take to manage the risks associated with Modern Slavery.

James Harrison
Compliance Manager