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Document Owner: David Trump

## Modern Slavery Policy Version: 0.1 Classification: Public



## **Document Version Control**

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#### 1. PURPOSE

The Modern Slavery Act 2015 ("Act") constitutes 'slavery, servitude and forced or compulsory labour', and 'human trafficking' to include the fact slavery and human trafficking are abuses of a person's freedoms and rights.

BOM Group Limited is unequivocally opposed to such abuses in all our operations whether direct, indirect or in our supply chain as a whole. We are committed to improving our practices to combat slavery and human trafficking, to ensure that slavery and human trafficking do not take place in any part of our business or our supply chains. It is our policy to conduct all of our business in an honest and ethical manner.

## 2. OUR BUSINESS

BOM Group Limited provides managed services and ancillary products to its customers. BOM Group Limited undertakes checks in relation to its staff which includes checking documentation such as their right to work and photograph identification, such as, passport, driving licence, etc.

#### 4. SUPLY CHAIN

BOM Group Limited's supply chains are subject to due diligence checks before engaging with BOM Group Limited to ensure compliance with the UK's Modern Slavery Act 2015 ("Act")

#### 5. RELEVANT POLICIES

BOM Group Limited is committed to ensuring there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Modern Slavery Act Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Other relevant policies include:

- Anti-Bribery and Corruption
- Complaints Policy
- Corporate Social Responsibility
- Modern Slavery Act Policy
- Whistleblowing Policy

Our policies and Staff Handbook set out the behaviours we expect from our employees in their dealings with colleagues, customers, suppliers, agents, intermediaries, advisers etc. All employees are expected to act with integrity in accordance with the standards of behaviour set out in the Staff Handbook. We provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions; we encourage employees to raise any concerns.

#### 6. DUE DILIGENCE PROCESSES FOR SLAVERY & HUMAN TRAFFICKING

BOM Group Limited considers that the greatest risk of slavery and human trafficking may be in our supply chain where operations and managerial oversight are out of our direct control. We have been looking at our due diligence process and engagement with our suppliers and have made and continue to make a number of changes to strengthen and enhance the protections we have in place.

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### 7. MONITORING & COMPLIANCE

We continue to implement steps to measure how effective we have been and are becoming, to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. In particular:

- Ongoing training to all employees
- Monitoring of reported complaints; and
- A level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations

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