

ARROW COMMUNICATIONS HOLDINGS LIMITED

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015 and sets out the actions of the Arrow Group and its group of subsidiaries (Arrow) to understand all potential modern slavery risks related to our business, the steps taken to prevent slavery and human trafficking and measures identified to further improve these safeguarding measures in future periods. This statement relates to the period of January 2021 to December 2021.

Arrow has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our operation and supply chains. It has taken concrete steps to tackle modern slavery, as outlined in this statement and we recognise our responsibility to take a robust approach in respect of modern slavery and human trafficking.

Our business and supply chain

Arrow Business Communications Limited and its subsidiaries provide a full telecom, IT, energy consultancy and service proposition. We operate from twelve offices across England and Scotland and have a nationwide team. We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety, and environmental standards. We provide a due diligence questionnaire and assess each of our suppliers and their supply chains.

To date, we have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier.

Responsibility

The approach adopted, and continuing to be developed, focuses on the following objectives:

- Providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Ensuring that consideration of the modern slavery risks and prevention are added to key policy review processes as an employer and procurer of goods and service.
- Continuing to take action to embed a zero-tolerance policy towards modern slavery.
- Ensuring that staff involved in buying/procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.
- Policy review and update and internal awareness of such policies
- Risk assessments, led by Head of Legal, on suppliers and supply chains

Policies

Arrow operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy – there is a written and communicated policy under which all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Code of Conduct – our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our supply chain.
- Supplier Code – we have updated our Supplier Code and supplier contracts to make explicit reference to slavery and human trafficking legislation and compliance.
- Employee Handbook encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business.

Supplier due diligence

Arrow presently conducts due diligence investigations on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Reviewing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements
- Due diligence questionnaires that formalise the procedure to require all suppliers to attest that:
 - They don't use any form of forced, compulsory or slave labour
 - Their employees work voluntarily and are entitled to leave work
 - They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
 - They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
 - They don't require employees to surrender their passports or work permits as a condition of employment

Risk assessment

We continue to conduct a risk assessment of our supply chain by considering:

- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This ongoing assessment determines our response and the risk controls that we implement.

Awareness

Arrow will raise awareness of modern slavery issues by putting up posters across our facilities and sending an email that is focused specifically on modern slavery to all our staff explaining:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Training

In addition to the awareness programme, Arrow intends to plan and roll-out a fresh e-learning course to all employees and supplier contacts covering:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps Arrow will take if a supplier fails to implement anti-slavery policies or controls, to involve communication with the supplier to understand whether or not they intend to implement such policies in the future, and if not, re-evaluate whether their position as a supplier to Arrow
- An attestation from employees that they will abide by Arrow's anti-slavery policy

Measuring performance

Arrow is defining a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. To include, inter alia:

- Numbers / % of employees to have completed mandatory training
- Numbers / % of suppliers to have completed our ethics due diligence questionnaire
- Numbers / % of suppliers to have rolled out an awareness and training programme that is equivalent to ours
- Numbers of reported instances of potential non-conformance made by our employees

This statement covers 1 January 2021 to 31 December 2021 and has been approved by the Board of Directors.



Richard Burke CEO