EDGEBITS Cutting Edge Healthcare IT	Date adopted	October 2019
EDGEBITS Policy & Procedures Manual	Review frequency	Annual
MODERN SLAVERY & HUMAN TRAFFICKING POLICY	<b>Reviewed &amp; adopted</b>	January 2023
	Review date	January 2024

## EDGEBITS modern slavery and human trafficking statement 2023 to 2024

Here are the steps EDGEBITS has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains. This statement is published in line with section 54(1) of the Modern Slavery Act 2015.

### Our commitment to the principles of the Modern Slavery Act 2015

EDGEBITS is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

EDGEBITS has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

Our recruitment and people management processes are designed to ensure that all prospective team members are legally entitled to work in the UK and to safeguard our team from any abuse or coercion.

We are committed to creating and ensuring a non-discriminatory and respectful working environment for our team. We want our team to feel confident that they can expose wrongdoing without any risk to themselves.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

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### Our supply chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains. Our supply chains are limited and we procure goods and services from a restricted range of UK and overseas suppliers, mainly through UK government frameworks.

We require expect all our direct and indirect suppliers/contractors to adhere to our values on slavery and human trafficking. Where it is verified that a supplier or a subcontractor has breached the child labour laws or human trafficking, then this subcontractor will be excluded from our supply chain in accordance with Regulation 57 of the Public Contracts Regulations 2015.

## Our policies in relation to the Modern Slavery Act 2015

EDGEBITS has implemented the following policies which describe the steps we take to prevent slavery and human trafficking in our operations and supply chain

- Code of conduct
- Whistleblowing policy
- Dignity at work policy
- Equality and diversity policy
- Recruitment and selection policy.

# **Embedding the principles**

We will continue to embed the principles through:

- 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 staff involved in procurement activity are aware of and follow <u>modern slavery</u> procurement guidance on Gov.Uk
- ensuring that consideration of the modern slavery risks and prevention are added to our policy review process as an employer and procurer of goods and services
- making sure our procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- continuing to take action to embed a zero tolerance policy towards modern slavery
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.

### **Communication & awareness of this policy**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and our team.

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Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We are looking at ways to continuously increase awareness within our business, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

## **Responsibility for the policy**

The Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. EDGEBITS has primary and day-today responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

### **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship

This policy does not form part of any employee's contract of employment and we may amend it at any time.