



Business to Business e-Solutions

Anti-Slavery Policy

Modern slavery has untold costs on society, the person and their families who are trafficked in such a way. Modern slavery can take various forms, such as slavery, servitude, forced or compulsory labor, and human trafficking.

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Objective & Scope

Objective

Modern slavery has untold costs on society, the person and their families who are trafficked in such a way. Modern slavery can take various forms, such as slavery, servitude, forced or compulsory labor, and human trafficking.

The Group does not tolerate modern slavery in any form and is committed to implement and enforcing effective systems and controls to ensure this is the case as part of the Group's recruitment processes, and as part of the process in selecting suppliers, partners, and other organisations we may work or trade with.

Scope

This policy applies to all parties working with the Group or on the Group's behalf in any capacity, including partners, employees at all levels, Directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.



Definition

Abbreviation

The Group

- B2BE Group of Companies

Partners

- suppliers, contractors, business partners, consultants, clients.

Modern Slavery

Slavery

- where ownership is exercised over an individual.

Servitude

- the obligation to provide service imposed by coercion.

Forced or compulsory labor

- work or service not voluntarily performed.

Human trafficking

- arrangement or facilitation of the travel of an individual with a view to exploit them.

Child Labor

- employment of children that is exploitative.



Roles & Responsibilities



The Chief Executive has overall responsibility for this policy.

Human Resources, and Corporate Governance have primary and day-to-day 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 their staff understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Directors and Officers

- Evaluate investigation cases and execute verdicts;
- Ensure verdicts were executed fairly and aligned with organisation culture and this policy.

Corporate Governance

- Coordinate and evaluate cases and present the investigation results to Directors and Officers;
- Ensure verdicts were executed fairly and aligned with organisation culture and this policy;
- Ensure concerns raised are dealt with fairly;
- Ensure governance and implementation of policy across various functions of the organisation.

Human Resources

- Ensure indicators of slavery were picked-up and investigated promptly;
- Fully comprehend complaints or situations and conduct necessary investigations promptly;
- Evaluate complaints or situations fairly;
- Ensure policies, procedures, and administration of employees comply to this policy and individual country regulations;
- Create and ensure employees are aware of this policy, the organisation's stance, and the procedure to raise concerns;
- Ensure employees are paid their legal pay entitlements, and all elements of compensation and calculation is transparent and obtainable by the employee.

Procurement, Sales, and Individuals Dealing with External Parties

- Ensure suppliers, contractors, and business partners are aware of this policy, the organisation's stance, and the procedure to raise concerns;
- Conduct appropriate checks and risk assessments on external third parties to ensure compliance with this policy.

Line Managers

- Report violations of this policy to Human Resources, or Corporate Governance;
- Ensure team members, and partners where necessary are aware of this policy and create an environment in which employees can express concerns freely.

Employees

- Employees have the responsibility to raise concerns providing he/she has a reasonable belief that someone is being exploited or ill-treated.



Compliance

All partners and employees must read, understand, and comply with this policy. Everyone working in the Group is responsible for preventing, detecting, and reporting modern slavery if it is encountered.

If anyone becomes aware of or suspects that modern slavery is taking place, they must immediately notify their manager and/or the Group's representatives. This applies whether the suspected slavery involves the Group or any third party which the Group may interact with. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy.



Communication

This policy shall be communicated to all employees and partners at the outset of the business relationship.

Breaches of Policy

The Group may terminate its relationship with any employees, partners, and with other third parties or organisations who breaches this policy via disciplinary action and other means.

Future Steps

The Group is committed to develop and provide training in relation to this policy as part of the induction process for all employees especially those who are involved in recruitment, supplier engagement, or management dealing with our trading partners.

