

Modern Slavery Statement for the year ending 31 March 2024

Introduction

The UK Modern Slavery Act 2015 (the “**Act**”) requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chain.

Pursuant to section 54(1) of the Act, this statement refers to the financial year ending 31 March 2024 and sets out the steps taken by Specialist Computer Centres plc (“**SCC**”) to prevent modern slavery and human trafficking in its business and supply chain.

Our commitment

As part of a private family-owned group of businesses, responsibility principles underpin SCC’s culture and ethical policies and values. SCC’s five core values are as follows:



In line with our core values above, we are committed to conducting business responsibly in a manner that respects human rights and the dignity of all people. We acknowledge our responsibilities in accordance with the Act and we do not tolerate any conduct that contributes to, encourages, or facilitates human trafficking, child labour, forced or compulsory labour, or any other human rights abuses.

Proud to be a key West Midlands and UK wide employer, we are keen supporters of job creation and enterprise in the West Midlands region and beyond, take our responsibility for the environment seriously, and remain active in the communities in which we operate. Our group charitable trust supports a wide range of causes, and our employees participate in charitable initiatives that not only benefit society, but their own development too. SCC is also the prime sponsor of SCC Academy which introduces under-privileged 18–25-year-olds to technology in an increasingly connected world. SCC Academy’s participants are given formal tuition and a grounding in technology in a series of short courses and are equipped to enjoy the benefit of ownership of technology and the ability to engage in online learning allowing such participants to develop both essential and advanced IT (Information Technology) skills.

Our structure

SCC is Europe’s largest privately-owned IT services business. SCC is the technology division of Rigby Group (RG) plc, the parent company for a portfolio of different business operations. To find out more about the nature of SCC’s own business please click <https://www.scc.com/about-scc/>.

SCC's supply chain is extensive given the diversity of its operations. Within its supply chain, key areas are labour (including sub-contract labour and temporary resourcing workers), materials, goods, and equipment.

To provide IT services and resell products in the IT sector, we directly and indirectly procure products and services from a significant number of third-party global manufacturers and suppliers, but primarily from established technology brands and reputable authorised UK-based distribution channels.

We actively encourage and require our suppliers to operate in such a way that respects human rights and the dignity of all people.

Proactive steps to prevent modern slavery

Starting with our own business operations and service providers and then increasing the visibility we have of our global supply chain; we work to identify actual or potential risks of modern slavery and help ensure remediation where cases are identified.

During the financial year, SCC has been proactively identifying and implementing steps that can be taken to ensure that we are open and transparent in the way we operate our businesses, therefore ensuring that our transactions and relationships are firmly compliant with our responsibilities under the Act.

These steps can be summarised into three areas: policies and procedures, risk assessment and due diligence.

Our policies and procedures

SCC has in place policies and procedures on key matters such as ethics and business conduct, bribery and corruption, health and safety, whistleblowing, anti-facilitation of tax evasion and anti-slavery and human trafficking. SCC periodically reviews its policies to ensure they are maintained to the highest standard and are reflective of current legislation and market practices.

- SCC's Ethics and Business Conduct Policy helps our people understand our core values and behaviours which underpin our business.
- SCC's Supplier Code of Conduct is currently available on our website at <https://www.scc.com/supplier-code-of-conduct/> and sets out the legal compliance expectations of all our suppliers.
- SCC's Whistleblowing Policy ensures adequate protection for whistleblowing including in respect of the area of modern slavery.
- SCC's Supplier On-Boarding Questionnaire reinforces our expectations of our suppliers regarding anti-slavery and human trafficking.
- SCC's Modern Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships. This includes implementing and enforcing effective systems and controls to encourage a "speak up" culture and to minimise the risk of slavery and human trafficking taking place anywhere in our business or supply chain.

These policies are recognised as being an important tool for documenting how to conduct ourselves as a business and individually in such a way which is appropriate, transparent, and respectful of others.

We recognise that, for our policies and procedures on all key areas to be effective, there needs to be an easily accessible reporting channel to ensure that our employees can raise concerns about malpractice or wrongdoing in confidence, including in respect of slavery and human trafficking.

Risk Assessment

We assess the potential human rights risks of our supply chain by considering the origin of our suppliers and by understanding and monitoring their approach to modern slavery as part of our supplier onboarding process. We endeavour to stay informed about emerging risks through regular and transparent relations with our suppliers and we maintain strong relationships with our labour force who form a significant proportion of our supply chain.

We continue to work with our contractors, suppliers, and business partners to ensure that they are open and transparent in their activities and are compliant with the Act.

Where SCC identifies any evidence or risk of non-compliance with anti-slavery and anti-human trafficking legislation, SCC will introduce measures to reduce and eradicate such risk or actual non-compliance.

Whilst regularly encouraging legal compliance, adherence to policies and procedures and recruitment and reward practices, the wider Group of companies that SCC is part of has an established Group Audit, Risk and Remuneration Committee which, in addition to the management of both internal and external audit processes and financial reporting within the Group, has a strong focus on risk management. Each group division (including SCC) nominates their own Enterprise Risk Owner who meets at least once a year to identify and document key enterprise risks which are then reported to the Risk Committee for discussion with the shareholders of the Group. To the extent any concerns or risks regarding modern slavery are identified these will be dealt with the utmost priority and measures will be implemented to eradicate any such risks to the extent possible. For SCC, our Chief Financial Officer is the nominated Enterprise Risk Owner.

Due diligence

In addition to our usual "know your customer" checks, we also carry out the following modern slavery specific checks when onboarding new suppliers and/or reviewing our existing suppliers:

- require evidence of our suppliers' modern slavery policies and review them to establish each supplier's commitment to monitoring and reducing the risk of slavery and human trafficking occurring within their supply chain;
- use <https://www.modernslaveryregistry.org>, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- use approved recruitment agencies or FCSA accredited umbrella companies when recruiting temporary labour for internal resourcing requirements.

We will continue to maintain transparent partnerships with our suppliers to ensure they are regularly considering the impact of the Act on their organisations. Where appropriate, we will also continue to look at streamlining the number of suppliers across our business to mitigate any risk associated with having multiple suppliers and to create improved partnerships so as to align our values more closely.

During the next 12 months, we will continue to conduct audits of our supplier onboarding processes and a sample of suppliers to assess the effectiveness of supplier chain risk assessment and treatment and, where appropriate, identify opportunities for improvement.

Future steps to prevent modern slavery in our supply chain

We understand that risks of modern slavery are dynamic and can change quickly.

We will continue to monitor the modern slavery risk by way of policy, risk assessment and due diligence and will seek to measure the effectiveness of steps taken to minimise such risk on a regular basis.

SCC will establish greater transparency through its supply chain by utilising third party risk management tools that will assess the risk of modern slavery through our supply chain and drive greater visibility and transparency and drive improvement of practices in line with current and changing legislation.

We will continue to review and refine our KPIs to identify additional predictive, corrective, and preventive controls, assess the effectiveness of current policies, practices and controls and identify opportunities for further improvement.

We will continue to encourage an open and transparent “speak up” culture that reiterates to all staff the core values of SCC and its wider group and ensures that our staff, at any level, feel able to openly and confidentially address any concerns they may have regarding modern slavery, human trafficking or indeed any other key issues in the knowledge that such matters will be taken seriously and without retaliation.

We train key employees in areas such as modern slavery, bribery and ethics and business conduct on an annual basis. Our obligations and expectations are flowed down to our supply chain through our [Supplier Code of Conduct](#) which encompasses all ten pillars of our ESG (Environmental, Social and Governance) commitments. Our compliance team have been working on the wider assurance training requirements including legal and regulatory compliance such as modern slavery awareness training, which we are now due to implement.

This statement was approved by the board of Specialist Computer Centres Plc.

Signed:

A handwritten signature in black ink, appearing to read "Dennis Badman", with a period at the end.

Dennis Badman
SCC UK Chief Executive Officer
Specialist Computer Centres Plc

(Last review April 2024, next review March 2025).