



## Anti-slavery and human trafficking policy statement

### 1 Introduction from the Chief Executive Officer

We are committed to improving our practices to combat slavery and human trafficking. We have a zero-tolerance approach to modern slavery across all areas of our organization, as well as in our supply chain. We are committed to ensuring we are not connected to modern slavery in any way. We aim to ensure that our business operates in an open and transparent way and our approach to tackling modern slavery throughout our supply chains is consistent with our obligations under the Modern Slavery Act 2015.

### 2 Organisation's structure

Bell is an IT Services and Consultancy company, focused on reducing the cost of IT, helping IT improve service delivery and sustainability and operates across Europe, Asia and the USA.

### 3 Our policies on slavery and human trafficking

We aim to work in partnership with all our contractors, suppliers and other business partners to ensure that they share and work towards the same values we hold against slavery and human trafficking. To manage this, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. We also ask our suppliers to confirm their compliance with the Modern Slavery Act 2015.

Our anti-slavery policy is available to all our staff via the company intranet and we inform our suppliers of our commitment to preventing modern slavery through their service contract.

### 4 Due diligence processes for slavery and human trafficking

As part of our commitment to tackling modern slavery and human trafficking, we have in place systems to:

- Identify, mitigate and monitor potential risk areas in our supply chains
- Work with our supply chains to ensure compliance with the Modern Slavery Act 2015
- Build long-standing relationships with our suppliers
- Encourage the reporting of any wrongdoing through internal and external whistleblowing procedures
- Protect whistle-blowers

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Employees are encouraged to raise concerns about any issues or suspicion of modern slavery in any part of our organization or supply chains at the earliest possible stage.

### 5 Supplier adherences to our standards

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a supply chain compliance program. This consists of:

- Standard clauses in sub-contract/sub-consultant contracts

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- Self-certification of compliance where applicable

We are committed as an organisation to tackling modern slavery and human trafficking and want to work with suppliers who share our values.

## 6 Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, we are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

DocuSigned by:  
*Manpreet Gill*  
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Manpreet Gill  
Director

2 October 2020

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