



# Anti-Slavery & Human Trafficking Statement

**Author:** Georgina Hayes

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### Introduction from the Chief Executive Officer

Modern Slavery is an umbrella term to refer to situations of exploitation that an individual cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power.

We are committed to complying with all applicable international human rights standards, labour and employment laws, rules and regulations, and working to mitigate the risks of modern slavery and human trafficking in our business operations and supply chains.

This statement covers the period 1 April 2022 to 31 March 2023, in compliance with the UK's Modern Slavery Act.

This statement assesses our risk, outlines our efforts and sets commitments for the coming year.

## Section 1. Organisational structure, operations and supply chains

### Founded in 1995, Bell Microsystems Limited ("BML") has two main businesses:

- Systems integrator (trading as "Bell Integration") delivering IT hardware and IT services, consulting and supporting organisations to develop the workspace that suits their needs by providing flexible and innovative solutions to help them move to up to date IT services and to streamline their operations.
- Procurement management services (trading as 'Bell Procurement Management') including the sale of deliverables to its customers purchased from its vetted supplier base located predominantly in Europe and the Asia Pacific region. Bell Procurement Management is a subsidiary of Bell Microsystems Limited.

### As of 21 September 2023, Bell:

- Employs 574 full and part time workers in Bell Integration and 64 full and part time workers in Bell Procurement Management.
- More information can be found about Bell on our websites.

## Our supply chains in the last financial year

### Bell Integration

- Bell Integration have approximately 900 third party suppliers from 23 countries.
- The majority of Bell Integration's direct suppliers (tier 1) are registered in Europe.

### Bell Procurement Management

- Bell Procurement Management work with over 300 third party suppliers in 18 countries (UK, Europe and South East Asia).
- The majority of Bell Procurement Management direct suppliers (tier 1) are registered in low risk countries but some of their operations and supply chains are global.

## Section 2 – Risk Assessment and Due diligence

Based on the nature of our business, we consider the risks of modern slavery and human trafficking to be low in our direct business operations.

However, we are aware that inherent and potential risks of modern slavery and human trafficking could be present in our supply chain, and we recognise that we have a role to play in the global effort to eliminate modern slavery and human trafficking.

Suppliers go through an onboarding process in which they are asked to comply with a minimum set of requirements in order to be included in our supplier base. This includes financial due diligence and acceptance of Bell's Supplier Charter.

In the last year, Bell Integration have initiated a new automated Supplier Management platform to ensure that we are conducting thorough checks on all Bell's suppliers (including all strategic and principal suppliers). This includes a risk-based questionnaire/screening tool to be used when onboarding all new suppliers which includes assessing modern slavery risks.

Whilst instances of modern slavery were not identified in Bell's operations and supply chain for the period of this report, Bell intends to work with any parties found to have instances of modern slavery in their operations or supply chain by providing education, guidance, and assistance as required.

No whistleblowing complaints were received.

### Section 3. Training and awareness raising

Increasing the skills and capability of our people is fundamental to our ability to conduct effective modern slavery due diligence on our supply chains.

Training is delivered through e-learning courses, face-to-face line manager events, webinars, and induction programmes for new employees.

Our commitment to ensuring our staff have received the necessary training throughout the financial year is evidenced by 95% of our active employees having completed the e-learning training in Modern Slavery (figure correct on 31 August 2023).

We expect all our suppliers to operate in a responsible, ethical, open, and transparent way and in compliance with all applicable laws and regulations. Our global teams work closely with suppliers to communicate our standards and help suppliers build their capacity to provide working environments that are safe, respectful of human rights, and free of modern slavery.

All employees are required to familiarise themselves with our Anti-Slavery and Human Trafficking Policy.

### Section 4. Key performance indicators to measure effectiveness of steps being taken

In September 2022, our performance on environmental, social and governance matters was recognised by the renewal of a Gold EcoVadis assessment for the Bell Procurement Management business (an independent sustainability ratings agency providing transparency into an organisations' sustainability practices). In December 2022, Bell Integration business was awarded a Silver EcoVadis rating.

Since its launch, 100% of applicable suppliers have accepted the terms of Bell's Supplier Charter. Our Supplier Charter requires our Suppliers to treat people with dignity and respect. All suppliers commit to:

- Comply with our Anti-Slavery and Human Trafficking Policy.
- Not engage in any form of human trafficking, procure commercial sex acts or use forced labour.
- Not use misleading or fraudulent recruiting practices, use recruiters that do not comply with local labour laws in the country where the recruiting takes place, expect workers to pay for a job, provide housing that does not meet the standards of the country where work is performed, or fail to provide an employment contract or recruitment agreement if required by law.
- Ensure that workers have freedom of movement and are free to leave their employment after reasonable notice.
- Return immediately any workers' government-issued identification, passports or work permits once they have confirmed workers' identities or working rights (to the extent that this is required).

In addition, we may require suppliers to demonstrate that they have relevant policies and procedures in place.

Bell seeks to continuously improve its own purchasing practices. We understand that we can have a profound impact on the conditions of workers in supply chains through our own purchasing practices. Aggressive pricing, short lead times and late payments are just a few examples of purchasing practices that can unintentionally create modern slavery risks.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. This Statement has been approved by the board of directors of Bell Microsystems Limited and its relevant subsidiaries on 20 September 2023.**

**Manpreet Gill**  
Director

21 September 2023