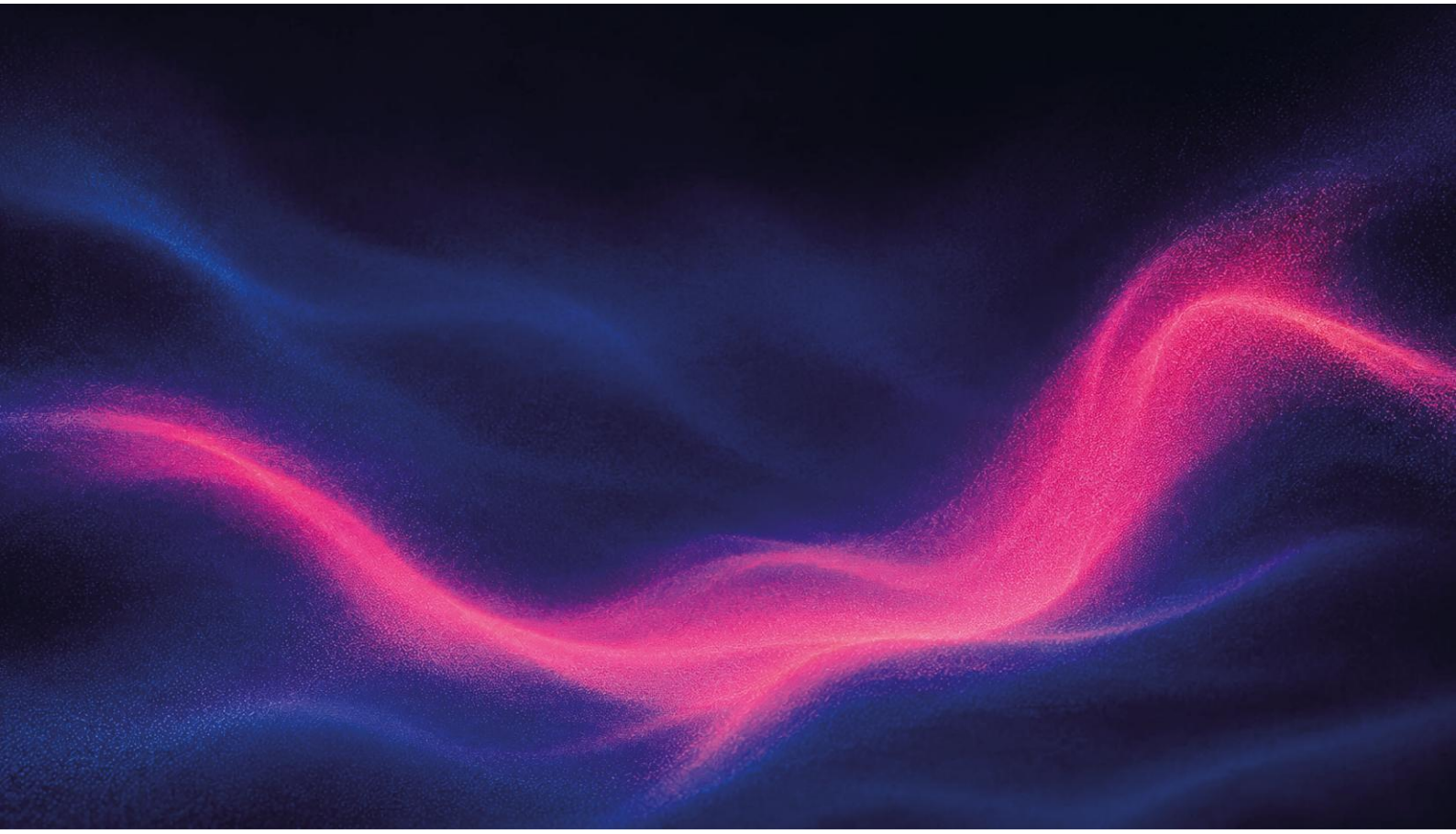
Bell Integration
Ambitious Transformation

Anti-Slavery Human Trafficking Policy



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Document Control

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1. INTRODUCTION

1.1 Purpose

The purpose of this policy is to set out Bell Integration's position (Bell Integration is defined below) on Modern Slavery and Human Trafficking. Bell Integration has a zero-tolerance approach to Modern Slavery and Human Trafficking within its business and its Supply Chains and this policy aims to ensure Bell Integration is:

- compliant with local, national and other applicable laws and regulations in the areas in which we operate;
- sourcing products and services in accordance with legal obligations and community expectations while working with Suppliers to improve their social and environmental practices;
- acting to prevent, mitigate and where appropriate, remedy Modern Slavery in operations and Supply Chains.

1.2 Scope

This policy is intended to apply to Bell Integration's shareholders, members of Bell Integration's Board and Executive Committees, to Bell Integration's managers and employees and to all persons that supply Bell Integration with goods and/or services.
If local legislation, regulation, or laws provide a higher mandatory standard then it will take precedence. Individuals are responsible for making themselves aware of the relevant laws in their country of operation in support of this policy.

1.3 Definitions

Word/Term	Meaning
Bell Integration	Bell Microsystems Limited and all its subsidiaries and branches in all locations.
Human Trafficking	The recruitment, harbouring and movement of a person with a view to their exploitation.
Modern Slavery	The illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic Servitude, forced labour, criminal exploitation and organ harvesting.
Personnel	Any individual currently engaged to provide services to or on behalf of Bell Integration in return for remuneration.
Servitude	Where the victim's personal freedom is significantly restricted, and they are not free to stop working or to leave their place of work.
Suppliers	Any organisation or person who provides Bell Integration with products and/or services, including their subcontractors, agents, related entities and consultants.
Supply Chain	A supply chain is defined as a sequence of activities or parties that provide products and/or services.

1.4 Legislative context

This policy seeks to implement across Bell Integration, the requirements of the UK's Modern Slavery Act.

1.5 Related policies and procedures

This policy interacts with C88 - Whistleblowing Policy. You are encouraged to familiarise yourself with this policy. If you have any queries about this policy please contact the Legal team.

2. POLICY STATEMENT

Victims of Modern Slavery and Human Trafficking can be any age, gender, nationality, and ethnicity. They may be tricked or threatened into work and may feel unable to leave or report the crime through fear or intimidation. They may not recognise themselves as a victim.

Bell Integration strictly prohibits the use of Modern Slavery and Human Trafficking in our operations and Supply Chain. Bell Integration is committed to implementing systems and controls aimed at ensuring that Modern Slavery is not taking place anywhere within Bell Integration or in any of Bell Integration's Supply Chains. Bell Integration expects that its Suppliers will hold their own suppliers to the same high standards.

3. RESPONSIBILITIES

3.1 Organisation responsibilities

Bell Integration will:

3.1.1 maintain clear policies and procedures preventing exploitation and Human Trafficking, and protecting our workforce and reputation;

3.1.2 be clear about our recruitment policy (see "Recruitment" below);

3.1.3 check our Supply Chains (see "Supply Chains" below);

3.1.4 lead by example by making appropriate checks on employees and contractors to ensure we know who is working for us;

3.1.5 ensure we have in place an open and transparent grievance process for all employees and Suppliers;

3.1.6 seek to raise awareness so that employees know what we are doing to promote their welfare; and

3.1.7 make a clear annual statement setting out the steps we have taken to ensure slavery and Human Trafficking are not taking place in our Supply Chains and to demonstrate that we take our responsibilities seriously.

3.2 Manager responsibilities

Managers will:

3.2.1 Listen and be approachable to employees;

3.2.2 respond appropriately if they are told something that might indicate an employee or any other person is in an exploitative situation;

3.2.3 remain alert to indicators of Modern Slavery (see "Identifying Modern Slavery" below);

3.2.4 raise the awareness of our employees, by discussing issues and providing training, so that everyone can spot the signs of Human Trafficking and exploitation and know what to do; and

3.2.5 use their experience and professional judgement to evaluate situations.

3.3 Individual responsibility

Whatever your role or level of seniority, you must:

3.3.1 keep your eyes and ears open - if you suspect someone (a colleague or someone in Bell Integration's Supply Chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see "Reporting Modern Slavery");

3.3.2 follow our reporting procedure if someone tells you something that you think might indicate that they are, or someone else is, being exploited or ill-treated; and

3.3.3 tell us if you think there is more we can do to prevent people from being exploited.

4. THE RISKS

The principal areas of risk we face, related to slavery and Human Trafficking, include:

- Supply Chains.
- Recruitment through agencies.
- Forms of excessive or unpaid working hours, lack of rest days.
- Personal identification or passport retention.
- Lack of adequate health and safety protection.
- Discrimination.

We manage these risk areas through our procedures set out in this policy and elsewhere.

5. PROCEDURES

5.1 Supply Chain

Bell Integration expects its Suppliers to comply with the principles set out in Bell Integration's Supplier Charter. Fundamental to the Supplier Charter is an expectation that all Suppliers operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed. Suppliers are required to ensure that there is no Modern Slavery in their Supply Chains and operations. When Suppliers identify any occurrence of, or material risk of, Modern Slavery in their Supply Chains or operations they must take practical and effective steps to address that occurrence or risk. Suppliers must notify Bell Integration as soon as practicable of any occurrence of, or material risk of, Modern Slavery or Human Trafficking that they have identified and must notify relevant authorities where appropriate.

5.1.1 Contractual terms

It is important that those involved in preparing, negotiating or approving contractual terms with our Suppliers ensure that those include provisions specifically requiring compliance with UK Modern Slavery laws and those foreign Modern Slavery laws that apply in the location(s) in which they operate.

5.1.2 Supply chain mapping and risk assessment

Bell Integration may encourage some of our Suppliers to complete a Modern Slavery questionnaire to provide us with a greater understanding of the risk of Modern Slavery within a Supplier's Supply Chains or operations and enable us to work with a Supplier to reduce the risks identified. Bell Integration will actively and progressively improve our understanding and oversight of all tiers of our Supply Chains.

5.2 Operations

5.1.3 Human Resources

We are committed to ensuring the health, safety and wellbeing of our workforce and we maintain a suite of policies that are informed by, and compliant with, applicable international workplace and occupational health and safety law.

5.1.4 Recruitment

5.1.4.1 Using agencies

Our recruitment team and hiring managers follow Bell Integration policy and only use Bell Integration's list of approved reputable recruitment agencies.

To ensure the potential for slavery and Human Trafficking is reduced as far as possible, any individual engaging a recruitment agency shall thoroughly check them before adding them to our list of approved agencies by:

- requiring them to sign a Master Services Agreement agreeing that:
- they have not committed an offence under any applicable laws relating to the prevention of slavery;
- they have not been notified that they are subject to an investigation relating to an alleged offence or prosecution under anti-slavery laws;
- they are not aware of any circumstances within their Supply Chain that could give rise to an investigation relating to an offence or prosecution under anti-slavery laws;
- they will notify Bell Integration immediately in writing if they become aware or have reason to believe that they, or any of their officers, employees, agents or subcontractors or Suppliers have breached or potentially breached any anti-slavery laws.
- ensuring the staff an agency provides have the appropriate paperwork (eg work visas); and
- ensuring the agency provides assurances that the appropriate checks have been made on the individual they are supplying.

The Recruitment team monitor their agencies on a monthly basis for tier 1 suppliers and quarterly for all others and the list of approved agencies is typically reviewed every 6 months.

5.1.4.2 General recruitment

It is a requirement, that all employees:

- have a written contract of employment and that they have not had to pay any direct or indirect fees to tain work.
- are legally able to work in the UK and/or in the jurisdiction where they will be employed.
- have been provided with information on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, the recruitment team or hiring manager suspect someone is being exploited they must follow our reporting procedures (See "Reporting Modern Slavery" below).

6. IDENTIFYING MODERN SLAVERY

There is no typical victim and some victims do not understand that they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a Modern Slavery or Human Trafficking victim:

- the person is not in possession of their own passport, identification or travel documents;
- the person is acting as though they are being instructed or coached by someone else;
- they allow others to speak for them when spoken to directly;
- they are dropped off at and collected from work;
- the person is withdrawn or they appear frightened;
- the person does not seem to be able to contact friends or family freely;
- the person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display a number of the indicators set out above but they may not necessarily be a victim of Modern Slavery or Human Trafficking. Often you will build up a picture of the person's circumstances which may indicate that something is not quite right.

If you have a suspicion, report it.

7. REPORTING MODERN SLAVERY

There is a range of support available for when a person becomes aware that someone is at risk of, or affected by, Modern Slavery or Human Trafficking practices, regardless of whether this occurs within Bell Integration Supply Chains and operations or in the broader community. Talking to someone about your concerns may stop someone else from being exploited or abused.

If you think that someone is in immediate danger, dial 999 or the emergency number in your location.

You are encouraged to refer to the Whistleblowing Policy which steps out how to appropriately respond to and report suspected cases.

Not all victims may want to be helped and there may be instances where reporting a suspected case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with your manager or the Whistleblowing Officer before taking any further action.

Otherwise, in the UK, you can report a suspicion or seek advice by contacting the UK's Modern Slavery Helpline confidentially on 08000 121 700. This is open 24 hours a day, 365 days a year.

You can report Modern Slavery or Human Trafficking online or call the UK's metropolitan police on 101 at any time to report an incident.

Should you wish to remain anonymous you can contact Crimestoppers in the UK on 0800 555 111.

8. TRAINING

All employees are required to complete mandatory training delivered through e-learning courses upon induction and every three years thereafter..

9. MONITORING

This policy reflects Bell Integration's current practice and may be updated by Bell Integration from time to time.

This policy does not form part of an employee's contract of employment. Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach, to terminating Bell Integration's relationship with the transgressor.

If any part of this policy is unclear, clarification should be sought from the Legal Team.