Modern Slavery Statement

This statement sets out Tectrade’s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2018 to 31st March 2019.

Tectrade is absolutely committed to the understanding of modern slavery and human trafficking risks and has zero tolerance for forced, bonded or compulsory labour, human trafficking or any other kinds of slavery. It is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas, ensuring that there is no modern slavery or human trafficking in its own business and supply chains, as set out in the Modern Slavery Act 2015.

Company Structure and Supply Chains

This statement covers the activities of Tectrade Computers Ltd (UK) and Tectrade Computers Corp (US).

Tectrade provides corporate and public-sector organisations with hardware, software and licenses as well as consultative, managed and cloud services.

We partner with a number of key hardware and software vendors to bring the latest and broadest range of technology to our customers, as well as providing specialist services. We do not manufacture products or develop software, these are produced by the vendors.

We supply predominately to medium to enterprise organisations, across all verticals, including public sector.

We operate and provide our services worldwide, however our primary bases and most of our services are delivered in the UK and the United States.

We do not currently trade with or procure from any organisations based in countries that are high risk.

We will conduct due diligence when selecting a new supplier to ensure they are fulfilling their obligations under the Modern Slavery Act 2015.

Responsibility

Responsibility for Tectrade’s anti-slavery initiatives is as follows:

- Policies: The CEO and HR Director are responsible for drafting and reviewing the Company’s policies. These policies are developed in line with legislative requirements and take into account best practice.
- Investigations/due diligence: The Board of Directors are responsible for deciding who will conduct investigations or due diligence in relation to known or suspected instances of slavery and human trafficking.
- Each of our suppliers will be reviewed for their level of risk and their policies on modern slavery
- Employees are made aware of this statement and their obligations under it on induction and throughout their employment.
Relevant Policies

Tectrade operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

**Whistleblowing Policy** Tectrade encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Tectrade’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns should contact the HR department in confidence by sending an email to HR@tectrade.com with the subject heading ‘Confidential Disclosure’.

**Employee Code of Conduct** Tectrade’s code makes clear to employees the actions and behaviour expected of them when representing the company. Tectrade strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

**Supplier/Procurement Code of Conduct** Tectrade is commitment to ensuring its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Tectrade works with suppliers to ensure that they meet the standards of the code and improve their worker’s working conditions. Serious violations of Tectrade’s supplier code of conduct will lead to the termination of the business relationship. We will not knowingly do business with any individual or company that abuses the rights of others.

**Recruitment Policy** Tectrade uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Where possible we prefer to recruit and employ directly with the individual.

**Corporate Social Responsibility Policy** Tectrade’s policy states our company’s ongoing commitment and determination to conduct our business ethically, honestly and with integrity. It applies to all our employees as well as our customers and suppliers.

**Anti-Corruption Policy** Tectrade’s policy states we are committed to applying the highest standards of ethical conduct and integrity in our business activities in the UK and overseas. All our employees and anyone acting on our behalf is responsible for conducting business honestly and professionally.

Due Diligence

Tectrade undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Tectrade’s due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- creating an annual risk profile for each supplier;

Performance Indicators

Tectrade has reviewed its key performance indicators (KPIs). As a result, Tectrade is:
• developing a system for supply chain verification expected to be in place by August 2018, whereby the organisation evaluates potential suppliers before they enter the supply chain; and

• reviewing its existing supply chains expected to be completed by end of August 2018, whereby the organisation evaluates all existing suppliers.

Next Steps

Going forward we’re looking at

• Training for our employees, who are involved with our procurement activities, to ensure they are aware of:
  
  o how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
  
  o how to identify the signs of slavery and human trafficking;
  
  o what initial steps should be taken if slavery or human trafficking is suspected;
  
  o how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
  
  o what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and “Stronger together” initiative;
  
  o what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
  
  o what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation’s supply chains.

• Due diligence and annual risk assessments on our approved suppliers.

This Statement was approved by the Tectrade Computers Ltd Board of Directors, who review and update it annually; and signed on its behalf by:

Alex Fagioli, CEO

July 2018