

Modern Slavery and Human Trafficking Policy

Pixelhousegroup and its subsidiary companies are committed to understanding and minimising the potential risk of modern slavery in its business and supply chains.

This policy is published in line with section 54(1) of the Modern Slavery Act 2015.

Our commitment to the principles of the Modern Slavery Act 2015

The Group are committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our supply chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited and we procure goods and services from a restricted range of UK suppliers.

Due diligence processes in relation to slavery and human trafficking

While reviewing the existing suppliers and assessing the new ones, we will conduct due diligence by:

- Careful mapping of the supply chain product
- Conducting supplier audits or assessments with focus on slavery and human trafficking
- Creating a risk profile for each supplier
- Educating the suppliers on the improvement of substandard practices by providing advice and recommending action plans
- Participating, as far as reasonably practicable, in collaborative initiatives organised to educate organisations and exchange information on most recent practices established to identify and tackle the slavery problem.

Risk assessment and management

The Group will assess and manage, as far as reasonably practicable, the risks associated with modern slavery and human trafficking within our businesses and supply chain.

Prior to the risk assessment we will map the supply chain to be able to understand the issues related to logistics, human processes and country of origin of goods, supplies and services used by our organisation.

Through the conducted assessment we will be able to pinpoint the risks, assess their level of importance and reinforce appropriate control measures.

Our policies in relation to the Modern Slavery Act 2015

The following policies are available to all staff through the Groups intranet:

- Code of conduct
- Ethics policy
- Whistleblowing policy
- Bullying and harassment policy
- Diversity and inclusion policy
- Recruitment and selection policy.

Embedding the principles

We will continue to embed the principles through:

- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring that consideration of the modern slavery risks and prevention are added to the Groups policy review process as an employer and procurer of goods and services
- making sure the Groups procurement strategies and contract terms and conditions include references to modern slavery and human trafficking
- continuing to take action to embed a zero tolerance policy towards modern slavery
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices

Effective action taken to address modern slavery, monitoring, auditing through Key Performance Indicators (KPI's)

The overview of the yearly performance summary against the modern slavery and human trafficking objectives will be available to the public on a written request as part of the transparency demand.

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Training on modern slavery and human trafficking

The Group will provide all necessary information, instruction and training for their employees and contractors to ensure the workforce has enough skills and understanding of the modern slavery and human trafficking problem to notice it, know how to report it and have sufficient knowledge to avoid it, especially in procurement, human resources and supply chain management

The Modern Slavery and Human Trafficking training will be proportionate to the size of the company and relevant to company undertakings.

The training will be delivered through:

- Acknowledgement of company Modern Slavery statement
- Toolbox talks
- Appropriate online training.

Senior Management and the at-risk managers, supervisors and employees will attend relevant seminars, workshops and courses on Modern Slavery and Human Trafficking to gain the latest and most updated knowledge.

The training progress will be included within the company key performance indicators and individuals' yearly objectives.



James Barnett – CEO
Pixelhousegroup