

Modern Slavery and Human Trafficking Statement



Introduction

This statement sets out SCCI Group's commitment to ensuring the integrity of our supply chain and adherence to ethical working practices in all our business relationships. We implement a number of controls and commit to continuous review and improvement in relation to the way in which we engage with, monitor and make decisions about who we do business with. The SCCI Group and each of its associated Companies (hereby collectively referred to as "SCCI") are committed to meeting the objectives of the Modern Slavery Act 2015. As a consequence, we hereby set out SCCI's:

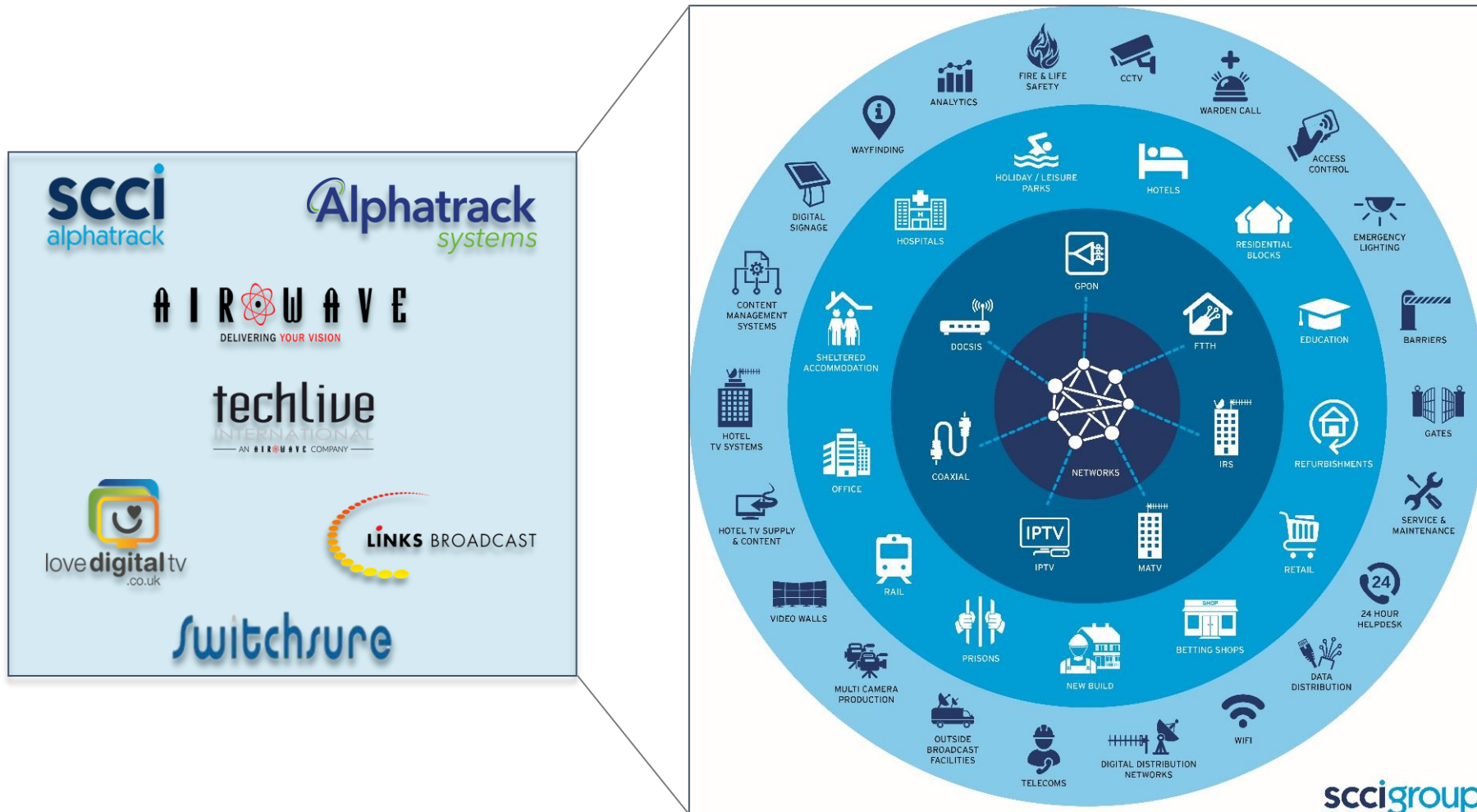
- statement relating to Modern Slavery and Human Trafficking
- actions taken to date
- commitment to further understand and address all potential modern slavery and human trafficking risks related to our business

This statement relates to actions and activities during the financial year 1 June 2020 to 31 May 2021.

David Fogelman, CEO, SCCI Group

SCCI Group Operations

The SCCI Group comprises a number of subsidiaries, each providing a range of products and services to clients within and outside of the UK with a combined turnover in excess of £50 million. We are a market leader in the supply, installation and maintenance of Information technology hardware, software and associated distribution technologies in the Media sector across the UK and in a number of locations within Europe. The head office of each subsidiary is located within the UK and, combined, SCCI Group has around 400 employees operating predominantly within the UK.



SCCI Group Supply Chains

SCCI procures the vast majority of parts, products and services from UK based suppliers and recognises that we have a responsibility to take a robust approach to modern day slavery. We therefore, take steps to ensure that our supply chains are free from slavery and human trafficking irrespective of whether they are a regular high volume or one-off supplier.

Goods and Services procured by SCCI Group

- Screen Media
- Human capital
- IT Software
- IT Distribution Products
- Fire and Life Safety equipment
- Logistics
- Consultancy Services
- Managed services

SCCI Group Policies and Processes regarding Modern Slavery and Human Trafficking

Actions implemented to December 2020

- **Modern Slavery Act Statement:** SCCI's commitment to meeting the objectives of the Modern Slavery Act 2015: published and reviewed;
- **Sustainable Supplier Charter:** a commitment to deliver ever more sustainable solutions for our people, our customers, the wider community and the environment in which we work and live by; promoting best sustainable practice and meeting or exceeding guidance set out by government and regulatory bodies. The charter includes requirements of suppliers in relation to ethical working and values. We continue to require members of our Supply Chain to share our aims and objectives and to sign up to this Charter.
- **Supplier Questionnaire:** due diligence process implemented with existing and new suppliers to ensure their compliance with SCCI's Sustainable Supplier Charter.
- **Recruitment:** Where labour is sourced via a third party, SCCI uses only reputable employment agencies and seeks to verify the practices of any new agency prior to engagement.
- **Training and compliance programme:** to raise awareness, continuously monitor and review the way in which each company and business of the SCCI Group interacts and engages with suppliers to ensure compliance with our programme to meet the objectives of the Modern Slavery Act.

Future and ongoing actions

- **Programme of communication and training:** to further raise awareness of Modern Slavery and Human Trafficking; the actions we can all take to ensure the promotion of and adherence to ethical working practices in all our business relationships.
- **Supply chain audits:** to ensure ongoing supplier compliance with SCCI Sustainable Supplier Charter;

- **Whistle blowing Policy:** Policy review completed to encourage active reporting and exposure of any suspected unethical behaviour or working practices;
- **Investigation process:** defining the process to be followed in the event of concerns raised specifically in relation to forced labour, human trafficking and / or slavery.

Relevant supporting policies and documentation

- **Modern slavery and Human Trafficking Statement / Sustainable Supplier Charter**

SCCI is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers (of goods and services) are required to demonstrate that they source from their own ethical suppliers and also undertake their own business ethically, providing safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code. However, serious violations of the organisation's supplier code of conduct may lead to the termination of the business relationship where immediate corrective action is not taken.

Before doing business with a new supplier, SCCI requires a response to the following questions:

“In relation to the Modern Slavery Act 2015, can you please detail your Company's commitment to ensuring the integrity of your supply chain and adherence to ethical working practices in all your business relationships” and “Can you provide a Copy of your Modern Slavery statement?”

Without a satisfactory answer and a copy of their Modern Slavery Statement, suppliers will not be approved and we will not do business with them.

- **SCCI Group Whistle blowing Policy**

SCCI 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. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Employee code of Conduct**

SCCI 's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when undertaking the work of the Company, interacting with others and managing the supply chain.

- **Recruitment Supplier Code of Conduct**

SCCI uses only reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Training and Awareness

All employees involved in the procurement of goods and services on behalf of the SCCI Group, all directors and Board Members have been fully briefed in relation to the provisions of the Modern Slavery Act 2015 and SCCI's programme to combat unethical working practices. SCCI continuously reviews training requirements and will provide further training in relation to ethical procurement as required.

SCCI Group Responsibility for Compliance with the Modern Slavery Act 2015

Name	Title	Responsibility
Simon Smith, MCIPS	Head of Supply Chain	Group responsibility for the procurement of all goods & materials required for the delivery of Group installation and maintenance services
Louise Hutchings	Group HR Director	Group responsibility for the procurement and engagement of all employees and workers. Group responsibility for SCCI's working practices.
Rob Wickings	Managing Director, SCCI Alphatrack	Responsibility for SCCI Alphatrack, Alphatrack Systems and Airwave Europe for the procurement and delivery of all services, consultants and contractors.
Tracie Williams	Managing Director, Love Digital TV	Responsibility for Love Digital TV and Evident Software for the procurement and delivery of all services, consultants and contractors.
Tim Worrall	Managing Director, Techlive	Responsibility for Techlive for the procurement and delivery of all services, consultants and contractors.
Alan Lawrence	Quality Manager	Responsibility for ensuring that the supplier approval process is carried out for SCCI Alphatrack Ltd and Alphatrack Systems Ltd

Signed:

David Fogelman

Title: Chief Executive Officer, SCCI Group

Dated: 31st July 2021