



CopyriteSystems

Passionate about Managed Print

Modern Slavery Policy

Limited Anti-Slavery & Human Trafficking Policy

This statement is made in reference to section 54 of the Modern Slavery Act 2015 and sets out the steps that Copyrite Systems has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Copyrite Systems currently has a turnover less than the amount prescribed by regulations made by the Secretary of State of £36 million to require an antislavery policy but feel the creation of an antislavery policy demonstrates our commitment to understanding modern slavery risks and ensuring that there is no modern slavery in our own business and supply chains.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Copyrite Systems has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

This policy applies to all persons working for Copyrite Systems or on our behalf in any capacity, including employees at all levels, directors, officer staff, shop floor workers, contractors, third-party representatives and business partners.

Responsibilities

The board of directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Compliance Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Our Business

- Copyrite Systems operates in the UK only.
- Copyrite Systems design, supply the UK market only.
- Copyrite Systems import products from worldwide suppliers.

Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-slavery policy. This policy sets out the organisation's stance on modern slavery.
- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks.
- Anti-corruption and bribery Policy. This code explains the manner in which we conduct all of our business in an honest and ethical manner.
- Code of professional conduct Policy. This code explains how business is conducted in a professional, strictly honest, ethical and impartial manner.
- National minimum wage & living wage. We operate in adherence to the government's wage rates.

Our Suppliers

We have undertaken an initial high-level risk assessment of our contracts, identifying where supply chains extend into sectors and territories that are high risk in terms of the potential presence of slavery and human trafficking. Copyrite Systems will ask suppliers identified as high risk to provide assurances that they have undertaken appropriate due diligence in ensuring that there is no slavery or human trafficking within the supply chains that serve their contract with Copyrite Systems.

We expect our suppliers and other companies we engage with to ensure their goods, materials and labour-related supply chains are:

- Fully compliant with the Modern Slavery Act 2015.
- Transparent, accountable and auditable.
- Free from ethical ambiguities.

Our Suppliers & Risks

Copyrite Systems operates a supplier policy and maintains a preferred supplier list which is reviewed annually. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation have never been convicted of offences relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.

Copyrite Systems will identify and assess potential risk areas in our supply chains.

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our Initiatives

- Requiring staff to complete training on modern slavery.
- Developing a system for supply chain verification.
- Reviewing existing supply chains.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the board of directors on 1 June 2020