



Modern Slavery and Human Trafficking Statement (2018-2019)

Introduction

This statement is made pursuant following section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that Focus Group has taken and is continuing to take to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain.

Focus Group has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard any form of modern slavery taking place within the business or our supply chain.

Our Business

We are a leading UK communications service provider with a portfolio of divisions including Voice, Mobile, IT, Data, Media, Print, Security and Energy. We employ over 250 staff and have an annual turnover in excess of £54m.

Our Supply Chains

Our supply chains provide us with telecommunication equipment. We ensure that all our suppliers provide us with a modern slavery and human trafficking statement.

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

Our Policies

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

1. Recruitment policy. We have a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our Suppliers

Focus Group conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses 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:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We conduct training for our procurement 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 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.

Financial Year End

30th November 2018

Approval for this statement

This statement was approved by the Board of Directors.

Name (Director) Chris Goodman

Signature

A handwritten signature in black ink, appearing to be 'CG', enclosed within a large, loopy oval shape.

Date 30/11/2018