

# Modern Slavery and Human Trafficking Statement

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**Approved by:** Roberta King  
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**Recent Amendment History:**

Version	Date adopted	Nature of change	Summary of key changes	Approved by
1.0	1 October 2019	Initial version		Roberta King
2.0	1 Sept 2020	Update to supply chain	Updates countries SQEPtech delivery services into	Roberta King
3.0	13 Sept 2020	Update to services	Inclusion of white labelling software details	Roberta King
4.0	15 January 2021	Updated version	Yearly review	Roberta King
5.0	11 January 2022	Yearly review	Minor mods within sections	Roberta King
5.1	30 March 2022	Updated version	Typos corrected & rewording	Roberta King

## **1. Introduction**

SQEPtech consider that modern slavery and human trafficking are crimes and violations of fundamental human rights. These may take various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

SQEPtech has a zero-tolerance approach to modern slavery and human trafficking within its business and supply chains.

This policy applies to all persons who work for SQEPtech or on our behalf, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and agents. This policy also applies to our contractors, external consultants, agencies, third-party representatives, suppliers and business partners.

This Modern Slavery and Human Trafficking Statement sets down SQEPtech Limited's commitment to preventing slavery and human trafficking in our business activities and the steps that have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. All those who work for SQEPtech have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

SQEPtech will act with integrity in all of its business dealings and relationships. This includes a transparent approach to tackling modern slavery and human trafficking, ensuring that appropriate controls are in place and in use.

## **2. Policy Scope**

SQEPtech is committed to ensuring that there is no modern slavery or human trafficking in its business or its supply chains. This Statement affirms SQEPtech's intention to act ethically in its business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

## **3. Organisational structure and supply chains**

SQEPtech is a global provider of implementation services for Cornerstone OnDemand and of innovative SaaS solutions and software. SQEPtech is based in the UK and complies with UK legislation. For more information please visit our website: <https://www.sqeptech.com/index.php/about-us/>.

Business activities cover the provision of:

- Software & infrastructure development of SQEPtech solutions and products
- UK payroll solution white labelling supplied by our partners
- Technical services as an integration partner

There is a risk that modern slavery and human trafficking exists within supply chains and any activities SQEPtech outsources. This risk may vary by legal jurisdiction. SQEPtech's supply chain is primarily concentrated in Europe and North America, where there are legal safeguards in existence. However, the existence of legal safeguards does not exclude or avoid the risk.

The Supplier Code of Conduct requires suppliers to agree on SQEPtech's position on modern slavery and human trafficking which is available for them to review on SQEPtech's website.

#### **4. Responsibilities**

The Senior Management Team, led by the CEO, are responsible for SQEPtech's Modern Slavery and Human Trafficking policy. Their responsibilities include:

- setting policy
- ensuring that systems are in place to manage and monitor compliance with this policy
- ensuring this policy is communicated and understood
- periodic review of this policy and updating where necessary

All SQEPtech staff and suppliers must comply with this policy.

#### **5. Training**

To ensure all staff have a good understanding of the risks of modern slavery and human trafficking, they must read and sign off their acceptance of the relevant training.

#### **6. Due Diligence Processes for Slavery and Human Trafficking**

SQEPtech undertakes due diligence when considering taking on new suppliers, and when regularly reviewing its existing suppliers. The due diligence process includes building and maintaining long-standing relationships with suppliers, making clear their expectations of their business partners, evaluating the modern slavery and human trafficking risks for each supplier and imposing sanctions against suppliers that fail to improve their performance in line with an action plan provided by SQEPtech, including the termination of the business relationship.

#### **7. Reporting**

SQEPtech staff must report any instance or suspicion of modern slavery or human trafficking to the management team as soon as possible.

Suppliers must report any instance or suspicion of modern slavery or human trafficking to the SQEPtech account manager or CEO as soon as possible.

#### **8. Policy breaches**

Any SQEPtech employee who breaches this policy may face disciplinary action. Dependent upon the nature of the breach, this may include gross misconduct and may result in dismissal.

For suppliers, dependent upon the nature of the breach, SQEPtech may opt to work with the supplier to resolve the issue. However, any supplier who breaches this policy may have its relationship with SQEPtech terminated.

#### **9. Monitoring**

SQEPtech ensures that slavery and human trafficking is not taking place in any part of its business or supply chains by monitoring the following:

- All relevant staff are to complete Modern Slavery training on an annual basis
- Modern slavery is included in staff induction training
- Whistleblowing mechanisms are place
- Ensuring all employees and suppliers sign this policy to certify that they will comply with the UK's Modern Slavery Act.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary, at a minimum of once per annum. The Directors endorse this policy statement and are fully committed to its implementation.

**This Modern Slavery and Human Trafficking Statement has been approved and authorised by:**

<b>Name:</b>	Roberta King
<b>Position:</b>	CEO
<b>Date:</b>	30 March 2022



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