



## Modern Slavery and Human Trafficking Statement

### INTRODUCTION

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. This statement sets out the steps taken by PS Networks to ensure that slavery and human trafficking are not taking place in any of our supply chains or in any part of our business. PS Networks is committed to ensuring there is transparency in our approach, consistent with our disclosure obligations under the Modern Slavery and Human Traffic Act 2015.

PS Networks has a zero-tolerance approach and we expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

### OUR BUSINESS, LOCATIONS, CUSTOMERS AND SUPPLY CHAINS

PS Networks work across a wide range of industries, including financial services, technology, telecommunications, government, hospitality, residential and media, we help leading global organisations design, build and manage the systems, infrastructure and connectivity for inspiring homes, productive workplaces and efficient data centres. The business was formed in 2006 and in the 14 years since inception has grown year on year..

Our offices are based in London, Dublin and Belfast and we deliver works throughout the UK and EMEA.

### POLICY ON SLAVERY AND HUMAN TRAFFICKING

PS Networks is committed to working ethically and with integrity in all of our business relationships, ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business activities. This statement reflects our commitment to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere within the supply chain.

### DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk, we undertake due diligence to monitor our supply chain, including:

- Identifying and assessing potential risk areas;
- Mitigating the risk of slavery and human trafficking occurring;
- Monitoring potential risk areas; and
- Protecting whistle blowers.

Our suppliers vary in size and frequency of use, and as such, a system is in place to suit all companies within the supply chain.

PS Networks product and service suppliers are required to:

- Supply a copy of their company policy which covers Modern Slavery and Human Trafficking; or
- Sign a Modern Slavery and Human Trafficking Declaration which is issued by PS Networks Head of Procurement; or
- Provide evidence to show compliance and due diligence to the Head of Procurement that the legal requirements are being met.

PS Networks Tier 1 product and service suppliers are required to complete our Supplier PQQ, which requires the supplier to provide details on the management of Health and Safety, environmental impacts, quality of the service and/or product monitored, insurances, training, and competency, current company policies, supply chain risk assessment, etc.

The PQQ is designed to identify the risk to PS Networks and our clients and enable us to determine if the risks are low or can be managed and controlled. As part of the PQQ statement, all suppliers are asked to provide evidence of their due diligence or Statement in line with the Modern Slavery and Human Trafficking Act 2015.

Where labour only suppliers are engaged they must provide the following for each operative working on behalf of PS Networks:

- A Proof of Right to Work Check; and
- A satisfactory DBS certificate.
- All relevant qualifications

We expect each and every entity in the supply chain as a minimum to carry out due diligence on the next link in the chain.

Whistleblowing is addressed in the Company's Employee Handbook and PS Networks has processes in place to support and protect any employee who wishes to raise a serious concern. Any disclosures made in good faith in relation to modern slavery or human trafficking and will be dealt with under the Whistleblowing Policy.

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chains, training is provided to relevant members of staff within PS Networks.

All Directors and Management have received training on the subject and are aware of their legal responsibilities.

## **EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We use the following processes to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains:

- Internal audits to ensure supplier compliance;
- Labour monitoring and payroll systems; and
- Communication and personal contact with our supply chain to ensure their understanding of, and compliance with PS Networks expectations.

#### FURTHER REVIEW

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board endorses this policy statement and is fully committed to its implementation.

Pauric Sheridan

Director – PS Networks

