

Modern Slavery and Human Trafficking Statement

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btlnet.co.uk

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Introduction

Whilst Britannic Technologies Ltd (hereinafter, “Britannic”, “we”, “us” or “our”) is not subject to Section 54(1) of the Modern Slavery Act 2015, we acknowledge our responsibilities in relation to tackling modern slavery and have adopted a statement of our corporate value on the prevention of modern slavery and human trafficking.

Britannic is firmly committed to maintaining the highest ethical and legal standards and will not tolerate any forms of slavery, forced labour, servitude, child labour or human trafficking, both in our business and in our supply chains. We do not enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to Britannic in the pursuit of the provision of its services is obtained by means of slavery or human trafficking and we strictly adhere to the minimum standards required in relation to our responsibilities under the employment legislation.

Internal governance

Britannic maintains effective business controls as well as a robust compliance program designed to detect and prevent violations of applicable laws, including laws regarding slavery, human trafficking and forced or compulsory labour. Our organisational policies and processes are reviewed and audited against applicable guidelines and legal and regulatory requirements.

This Statement sets out our approach to addressing modern slavery and demonstrates our commitment to transparency and accountability.

Business Background

We are consultative technology specialists in business communications, systems integration, digital transformation and managed services and our purpose is to help private and public organisations across the UK maximise their ICT investment.

Business Structure

We are part of Britannic Group Holdings, and our Head Office is in Surrey, United Kingdom. Britannic does not directly employ industrial and manual staff. All staff are salaried and are employed on full-time contracts. We do not employ temporary staff.

Our Supply Chains

We have long-standing strategic partnerships with leading business communications vendors, software developers and Tier 1 carriers including Mitel, BT Wholesale, 8x8, Five9, Microsoft, Gamma and Uniphore.

Our Policy on Modern Slavery and Human Trafficking

At Britannic, we are committed to ensuring that there is no slavery, forced labour, servitude, child labour or human trafficking in our supply chain or any part of our businesses. Our Board of Directors promotes and encourages transparency, ethical conduct and a commitment to comply with anti-slavery and human trafficking laws. We ensure that our employees are provided with the knowledge and resources necessary to help them meet our ethical and legal obligations. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business operations. It sits alongside our existing business policies including Equal Opportunities, Diversity and Inclusion, Dignity at Work, Corporate Responsibility, Health & Safety and Anti-Corruption Policies. All policies are reviewed and approved by the Board of Directors before being implemented and communicated to our employees.

Due Diligence Processes for Slavery and Human Trafficking

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

- Our Anti-Slavery and Human Trafficking Policy states that we will not tolerate or condone abuse of human rights or modern slavery within any part of our business or supply chain and will take seriously any allegations of violations. All reports will be investigated, and appropriate remedial action will be taken.
- We have strengthened our standard supplier contractual terms. Our 3rd Party Compliance Policy sets out the standards required of our suppliers and adds extra due diligence to ensure compliance with the Modern Slavery Act.
- We maintain rigid supplier approval programs to validate that all our suppliers and service providers meet our criteria before they can be classed as 'Onboarded'. If any issues related to modern slavery or human trafficking are identified, appropriate investigative and remedial actions are taken.
- We expect each entity to have suitable anti-slavery and human trafficking policies and processes, and we conduct third-party due diligence.

- Annual audits are conducted with many suppliers to ensure ongoing compliance.
- We conduct eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Where possible, we build long-standing relationships with our employees, customers, partners, manufacturers and suppliers and make clear our expectations of business conduct.

Our Effectiveness in Combatting Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been in working to ensure that slavery and human trafficking are not taking place in our business or supply chain:

- HMRC recognised payroll systems to ensure that all employees are registered and paid fairly for the work they do;
- Strong relationships/partnerships with the next link in the supply chain to ensure understanding of, and compliance with, applicable laws and Britannic expectations;
- Measuring completed/outstanding training, and the corresponding increase in employees' awareness of risk.

Additional information

For any questions or feedback related to the disclosure in this statement and our approach to human rights due diligence, including modern slavery and forced labour, please reach out to us at compliance@btlnet.co.uk.