

NASSTAR



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



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Contents

- 1 Purpose and Scope..... 3
- 2 Modern Slavery and Human Trafficking Statement 4
 - Nasstar and our Internal Processes..... 4
 - Nasstar and our supply chain 4
 - The control Process 5
 - Further Steps and Continued Development 5



1 Purpose and Scope

This statement relates to Nasstar Limited and all subsidiaries, hereafter known as Nasstar.

The purpose of the statement is to communicate our ongoing commitment to The Modern Slavery Act 2015 and covers the financial year of January 2021 to December 2021.

2 Modern Slavery and Human Trafficking Statement

We predominantly sell converged IT solutions and services to businesses. We have a zero-tolerance approach to both modern slavery and human trafficking in the provision of services to customers as well as whilst in direct or indirect contact with any individual.

Our expectations with regards to compliance to modern slavery and human trafficking are communicated to all employees and suppliers.

We are dedicated to ensuring that everything we do is ethical and lawful, and that we work in a socially and environmentally sustainable way internally and that the same is reflected across our supply chains.

Nasstar and our Internal Processes

Our Board of Directors is committed to creating a safe, fair and inclusive working environment for all employees and contractors. We periodically review our Modern Slavery and Human Trafficking statement, along with all other internal policies, to ensure we have incorporated the latest legislation and we have the correct policies, procedures and working standards in place to ensure our staff know how to tackle any issues. We have a Modern Slavery Policy and provide training to our employees on this subject through e-learning.

Nasstar and our supply chain

Suppliers' relationships are managed by our Procurement Team in conjunction with designated teams and individuals.

In order to deliver services to customers, we purchase equipment, software and services from a wide range of suppliers. The vast majority of supplier services are purchased from world renowned brands and are supplied through distribution channels within the UK and we have no areas of our supply chain where there is a high risk of modern slavery or human trafficking.

To ensure our suppliers and contractors comply with our values, we have in place a Supplier Code of Conduct which all suppliers and contractors must adhere to. All suppliers and contractors are required to adhere to the obligations set out in the Supplier Code of Conduct which cover:

- Compliance with Legislation;
- Child Labour;
- Forced Labour;
- Freedom of Association and Right to Collective Bargaining;
- Compensation and Working Hours;
- Discrimination;
- Business Continuity Planning;
- Improper Payments and Bribery; and
- Environment.

Supplier or contractor non-compliance will result in us reviewing the contractual relationship with the offending party.

The control Process

We conduct reviews with suppliers and contractors where we have concerns, to ensure they are compliant with all aspects of the Modern Slavery Act 2015. All new suppliers and contractors must follow an on-boarding process which requires clarification of their approach to ensuring compliance with this legislation.

Internally, to ensure our compliance, prior to any member of staff commencing employment (either on a temporary or permanent basis), relevant checks are undertaken to ensure the individual has the legal right to work within the UK. Our ongoing compliance includes providing access to modern slavery training course modules to all staff at all levels to ensure recognition of any contravention of law relating to modern slavery is dealt with appropriately and efficiently.

We review our own internal processes as part of our wider compliance management obligations. Any issues identified which contravene modern slavery legislation are dealt with promptly and any corrective and/or preventative measures are put into place as necessary. A whistleblowing policy is in place to allow for concerns to be raised anonymously regarding employees or suppliers. Internal policy breaches will be investigated and managed in accordance with our Disciplinary & Capability Policy.

Further Steps and Continued Development

We are committed to improving our practices to combat slavery and human trafficking. We will take further steps to engage with our current and new suppliers, contractors and employees to make sure they comply with all relevant legislation and to minimise any risks.



Jim Chapelle
Purchasing Director

16/02/21