



## **Modern Slavery Statement**

**This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Evolve's Modern Slavery and Human Trafficking statement for the current financial year which ended 31<sup>st</sup> January 2024.**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain, by our business partners or in any part of our business. We take a zero-tolerance approach to any suspected or actual violations.

The Board shall take responsibility for implementing this statement and its objectives, will monitor its use and effectiveness and shall provide adequate resources and investment to ensure slavery and human trafficking is not taking place within the Company or our supply chain.

### **Scope, Organisation Structure and Supply Chains**

This statement is applicable to all services and staff (including contractors and consultants) operating under Evolve BG Ltd. Our business involves the supply, configuration and support of telecommunications solutions worldwide. We have around 115 employees, operating from our office in Wigan, and at customer sites throughout the UK.

Our four primary services – Business Connectivity, Guest Wi-Fi, SD-WAN and IT Support – provide one-stop solutions for all telecom needs. Our supply chain involves the sourcing, acquisition and supply of telecommunications services, software and hardware.

The majority of our supply chain for goods and services are recognised brands that are supplied within the UK. However, we as a Company recognise that imported goods from sources outside of the UK may be more susceptible to slavery and human trafficking risks. Evolve are committed to operating our business ethically and with integrity, and so as customers we play an active role in monitoring our suppliers to ensure that they operate in line with our Policies and in line with legal and regulatory requirements.

### **Policies & Governance in Relation to Slavery and Human trafficking**

We as a Company recognise that we all have a responsibility to mitigate and be alert to the risks of slavery, servitude and forced or compulsory labour within our businesses and within our supply chain. In addition to confirming all employees have the right to work in the UK and the Company pays all employees fairly, competitively and above the minimum wage; our internal documents hold the following controls to reflect our commitment to acting ethically and with integrity and to ensure that any potential risks in relation to modern slavery are identified:



### Staff Handbook:

Our Staff Handbook outlines the Company's position on:

- Whistleblowing: this Policy ensures that all our employees know that they can raise concerns about any wrongdoing at work (within our business or supply chain) without fear of detriment. The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.
- Diversity, Equity and Inclusion Policy: Our Policy has been implemented to ensure the fair treatment of all individuals. All persons working for the business have the right to be treated with dignity and respect. This Policy outlines key Company objectives to encourage staff to take an active role in combating all forms of unlawful discrimination, harassment and victimisation and to ensure that staff can rely on the Company's support in these cases.

### Anti-Bribery & Corruption Policy

This Policy ensures that all Company personnel conduct business in a legal and ethical manner. Staff are expected to be vigilant and to report any suspicion of bribery, which may occur in an effort to hide any wrongdoing including slavery or human trafficking. This Policy is also contained in the Staff Handbook.

### Supplier Management Policy

The Supplier Management Policy sets out the process to ensure that as part of the on-boarding and on-going management of a supplier, we have sufficient controls in place to identify, escalate and take appropriate actions to manage risks.

If staff believe or suspect a breach of or conflict with this Statement or any associated Policy has occurred or may occur, they must notify their line manager, Compliance and/or a Director.

### **Due diligence process**

The Company will not support or deal with any business knowingly involved in slavery or human trafficking. As part of our Supplier Management Process, due diligence may incorporate a review of the supplier's controls surrounding human trafficking, slavery and servitude. Should the Company deem there to be a risk, specific questions may be asked around pay, employment practices and contracts.

### **Risk assessment and management**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or elsewhere in our business. If any real or potential risk becomes apparent, the Company commits to acting immediately and decisively to highlight and remedy it.

Based upon the services we provide, we have deemed that the risk of slavery within our business is low. As outlined above, the Company have a number of



Policies which enable us to mitigate to risk of slavery within our business, and the Company shall continue to ensure that the risk remains minimal.

With our suppliers, a great deal of our suppliers are deemed to be low risk as they provide services within low-risk sectors and are based in the UK. However, the Company intends to undertake a risk assessment of our suppliers, based upon factors such as their employment practices, location, industry sector and our reliance on this supplier as a business, as our supplier management framework matures. We intend that all suppliers will be categorised and set against the above criteria.

The Company will continually review the risk of slavery within our business and supply chain and make any necessary changes to our practices if required.

**Key performance indicators to measure effectiveness of steps being taken**

Risks and incidents relating to Modern Slavery are monitored by exception through existing controls within the aforementioned Policies. Any Modern Slavery risks and issues will be escalated the reviewed as part of the Company risk assessment.

**Training on modern slavery and human trafficking**

All associated Policies are available to all staff, are reviewed periodically and all staff must adhere to these Policies.

This Statement will be reviewed annually and published. A full copy of this statement will be accessible to all employees.

Compliance is registered with 'Stronger Together' and will periodically review their training materials and resources in order to assess the risk to our Company. The Company will provide appropriate training.

**This Statement was approved by the Board and will be reviewed annually.**

**Alan Stephenson-Brown**

**CEO**

**Date 15<sup>th</sup> July 2024**