

Press Data Anti-slavery and human trafficking policy

Policy Statement

Press Data is committed to acting in an ethical manner and with integrity in all business dealings and relationships, and to implementing and enforcing systems and controls to ensure that modern slavery is not taking place anywhere within our own business, or in any of our supply chains.

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Scope of this policy

This policy applies to all persons working for Press Data, or on our behalf in any capacity, including employees at all levels, permanent and temporary staff, short-term staff, casual staff, contractual staff, agency workers, freelance workers, seconded workers, interns, volunteers, agents, contractors and suppliers.

Policy Commitments

Press Data has no tolerance of slavery or human trafficking and strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain and contractors. We are, and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation, or in any of our supply chain.

We expect all those in our supply chain and contractors to comply with our values in this respect. Where possible we prefer to build long-standing relationships with our suppliers and we make clear our expectations of business behaviour. We expect all our suppliers to have suitable anti-slavery and human trafficking policies and processes within their businesses and to cascade those policies to their own suppliers. Press Data expects that our suppliers will hold their own suppliers to the same high standards.

Commitments

Press Data is a company which expects everyone working with us, in any capacity, or on our behalf, to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chain.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Employees and workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

- We are committed to engaging with our suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with this policy, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk based approach we may require that employment and recruitment agencies and other third parties supplying workers/other to our organisation, to confirm their zero tolerance to this issue, and we may seek evidence of this.
- We expect that suppliers engaging workers through a third party should obtain that third parties' confirmation of zero tolerance of modern slavery and human trafficking.
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance on this issue.
- We include appropriate terms in our contractual documentation, standard terms and conditions and supplier code of conduct which require third party contractors to comply with the Modern Slavery Act 2015 and relevant legislation.
- Through our training and learning programmes and monitoring, staff are encouraged to identify and report any potential breaches of the company's anti-slavery and human trafficking policy.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach, to termination of contracts. Any instances of non-compliance will be assessed on a case-by-case basis, and appropriate action will be taken.
- As a company, Press Data is committed to combating the risks of human slavery in every part of our business. We are committed to driving high standards across the company, and the principles which form the basis of this policy are discussed with all members of our team. We remain open to considering any ways in which our company can work to combat modern slavery and human trafficking.