



bjss

**MODERN SLAVERY
AND HUMAN
TRAFFICKING STATEMENT**

BJSS POLICY – MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024/2025

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Our Commitment

BJSS does not tolerate modern slavery or human trafficking in its organisation or in its supply chain. The company is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or supply chain.

BJSS is also committed to ensuring there is transparency in its business and its approach to tackling modern slavery throughout its supply chain, consistent with its disclosure obligations under the Modern Slavery Act 2015. BJSS expects the same high standards from its contractors, suppliers and other business partners, and as part of its contracting processes includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. BJSS expects its suppliers will hold their suppliers to the same high standards.

Our Organisation

BJSS is a global technology and software engineering consultancy. For over 30 years, we have provided brilliant software engineering to help customers achieve truly transformative outcomes. Our passionate experts put clients first and are proven to deliver, time and time again. That's why we're trusted to solve complex technology problems.

Due Diligence

We recognise the importance of identifying and mitigating modern slavery risks within our supply chain.

To this end, we:

- 1. Supplier Assessment:** Conduct risk assessments of our suppliers to identify potential areas of concern related to modern slavery and human trafficking.
- 2. Supplier Audits:** Engage in regular supplier audits to verify compliance with our Supplier Code of Conduct.

Our Supply Chain includes:

- Recruitment agencies and suppliers of contract IT professionals.
- Suppliers of IT equipment, software and services.
- Professional services from lawyers, accountants and other advisers.
- Office cleaning and other office facilities services.
- Print and promotional material production.
- Marketing and PR services.

We take a firm approach to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to complete BJSS due diligence checks as part of a robust onboarding process. Through this, potential suppliers are asked to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Our supplier management process includes:

- Mapping the supply chain broadly to assess particular product, service or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new supplier and gathering insight about their policies and practices via the onboarding checks.
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- Conducting supplier audits or assessments through our internal Operations team and categorising each supplier against a risk matrix.
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers through our internal Operations team and requiring them to implement action plans.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

BJSS also undertakes due diligence in relation to its employment practices and when considering taking on new suppliers. The company's due diligence includes:

Employees:

- Publishing a modern slavery statement to inform employees of the organization's zero tolerance policy to modern slavery.
- Providing guidance on what modern slavery is and what employees should do if they believe they have identified a risk of modern slavery.
- Ensuring employees have access to training materials and information about modern slavery and human trafficking.
- Ensuring all employees are aware of their contractual and statutory rights through contract of employment and an employee handbook.
- Having policies that further support the company's approach to reduce the risk of modern slavery and human trafficking, such as the employee code of conduct, grievance policy, whistleblowing policy, policies that refer to worker wages and H&S policies around working environments.
- Monitoring employee wages to ensure they are paid a minimum wage.
- Being aware of the company's responsibility to report any suspected incidents of modern slavery and human trafficking to the Gangmasters & Labour Abuse Authority's.

Risk Management

Whilst BJSS has low risk of modern slavery and human trafficking in relation to employment due to the nature of the business – we have identified some areas of focus where we will continue to monitor risk.

- **Youths seeking work experience** – to support young students who are seeking work experience placements and the opportunity to learn more about working in the technology industry, on occasion, BJSS accepts a limited number of requests for work experience. To reduce any risks associated with these experiences, BJSS limits the period of time and closely monitors the student's experience through a dedicated mentor.
- **Recruitment/Agency workers** – we use only specified, reputable employment agencies to source labour and always verify the practices of any new agency via our supplier onboarding process. Once onboarded, regular reviews take place with the Senior leaders of the agency where all KPI areas are covered including performance, governance and compliance. It is using before accepting workers from that agency.

NB. In 2023, three suppliers failed onboarding due to not having appropriate policies in place and no services were engaged as a result.

BJSS Performance Indicators

We are committed to continuous improvement in our efforts to combat modern slavery. This includes reviewing and updating our policies, conducting regular risk assessments, and collaborating with stakeholders to drive positive change.

- **Recorded cases** – no occurrences of modern slavery recorded or uncovered within the organisation or its supply chains.
- **Regular monitoring** – BJSS internally audit the risk of modern slavery under its Risk Register process where Heads of Functions meet with Directors monthly to review governance and discuss any areas of concern.
- **Awareness growth activity** – to continue to grow awareness, we communicate our no tolerance commitment to Modern Slavery and Human Trafficking to all new employees as part of their induction. Further details can also be found in our employee handbook.

Training

As part of BJSSs ongoing commitment to grow our employee's awareness of the risks relating to Modern Slavery and Human Trafficking, we currently host a number of modules and articles on our internal training platform LearnHub.

Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. Full details of our policies are available upon request.

- **Whistleblowing policy** – We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, contractors, customers or others who have concerns can raise this anonymously via our SPOT incentive.
- **Employee code of conduct** – Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Corporate social responsibility** – Growing the business sustainably for the long term is very important to us, along with delivering high-quality services to our clients and continuing to make BJSS a great place to work. We will continue to achieve all this by delivering sustainable programmes that support our community development themes of Youth and Technology. We are committed to being a responsible employer and we have an ambitious strategy where we partner with various community organisations in each of the cities that BJSS is located.

Applicability

This policy applies to everyone working for BJSS or on its behalf in any capacity. Including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners. This policy does not form part of any employee's contract of employment, and we may amend it any time.

Responsibility

The BJSS Board is responsible for ensuring this policy complies with BJSS' legal and ethical obligation, and that all those under its control comply with it. Divisional Directors are responsible for ensuring compliance in their Divisions and for their supplier relationships. They have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Employees are responsible for ensuring they are familiar with employee policies and guidelines relating to modern slavery and complete any associated compliance training.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes BJSS' slavery and human trafficking statement for the current financial year.



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