



Telecom Risk Consulting Ltd

TRC Modern Slavery Policy

Policy Statement

Telcom Risk Consulting Ltd is committed to conducting its business operations and activities in a manner that prevents involvement in modern slavery and human trafficking, directly or indirectly, as set forth in the Modern Slavery Act 2015. This policy applies to all individuals who work for or on behalf of Telcom Risk Consulting Ltd including employees, contractors, suppliers, and other stakeholders.

Scope

This policy applies across all divisions, sectors, and operations of Telcom Risk Consulting Ltd, including its supply chain and partners.

Definitions

- Modern Slavery: Modern slavery encompasses slavery, servitude, forced and compulsory labor, and human trafficking, where individuals are deprived of their freedom and forced to work in inhumane conditions.
- Human Trafficking: The recruitment, transportation, harbouring, or receipt of people through threat, coercion, or deceit, with the aim of exploiting them.

Policy Objectives

1. Compliance: To comply with all applicable laws and regulations concerning modern slavery and human trafficking.
2. Awareness: To raise awareness among employees and suppliers about the risks and the need for vigilance.
3. Due Diligence: To carry out due diligence on suppliers and contractors to ensure compliance.
4. Transparency: To disclose the steps taken to prevent modern slavery in annual statements and reports.

Responsibilities

- Senior Management: Responsible for the implementation and compliance of this policy.



Telecom Risk Consulting Ltd

- Employees: Responsible for adhering to this policy and reporting any suspected breaches.
- Suppliers: Responsible for complying with this policy and confirming their own compliance as well as that of their own supply chain.

Actions

1. Risk Assessments: Conduct regular risk assessments to identify areas where the organization may be at risk of involvement in modern slavery.
2. Training: Provide regular training and guidance for employees and key suppliers on modern slavery risks and prevention.
3. Due Diligence: Conduct appropriate checks on new suppliers, and maintain ongoing reviews of existing suppliers.
4. Auditing: Undertake audits of high-risk suppliers to ensure compliance.
5. Reporting: Establish clear pathways for employees and other stakeholders to report suspected instances of modern slavery, confidentially and without fear of retaliation.

Enforcement

- Breach of this policy by an employee will be regarded as a disciplinary matter, invoking relevant disciplinary procedures.
- Suppliers found to be in violation may have their contract terminated and be reported to relevant authorities.

Reporting

Telcom Risk Consulting Ltd will produce an annual Modern Slavery Statement outlining the steps taken to prevent modern slavery in its operations and supply chain, whenever these are identified.

Review

This policy will be reviewed annually and may be updated periodically, considering legal and organizational developments.



Telecom Risk Consulting Ltd

Modern Slavery Statement

Telecom Risk Consulting Ltd, United Kingdom

Date: 01 April 2023

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Telecom Risk Consulting Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain during the financial year ending 2023.

Our Business

Telecom Risk Consulting Ltd is a eLearning development company based in Cambridge, UK. We have a very small supply chain and operate in the UK.

Our Policy on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chain. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships.

Due Diligence

Given the size of our organization and the nature of our operations, we assess the risk of modern slavery as low. Nevertheless, we have implemented due diligence procedures designed to establish, assess, and monitor areas of potential risk in our business operations. These include:

- Conducting risk assessments to identify areas of potential vulnerability.
- Implementing supplier audits or assessments through third parties.
- Requiring suppliers to confirm their compliance with our Anti-Slavery Policy.



Telecom Risk Consulting Ltd

Training and Capacity Building

We provide training to key staff to ensure they understand the risks of modern slavery and human trafficking and can identify signs of potential violation.

Reporting and Whistleblowing

We have established a confidential reporting system for employees and stakeholders who suspect instances of modern slavery within our organization or supply chain. This aligns with our comprehensive whistleblowing policy, aimed at encouraging a culture of openness and accountability.

Key Performance Indicators

To measure the effectiveness of our Anti-Slavery Policy, we will review the following key performance indicators (KPIs):

1. Number of staff trained on modern slavery and human trafficking.
2. Number of supplier audits conducted.
3. Number of reported incidents and their resolution.

Review and Future Steps

This statement will be reviewed and updated annually. For the next year, we aim to:

- Increase staff training programs on modern slavery.
- Enhance due diligence in our supplier selection process.
- Regularly update and review our policy and procedures.