

A) ORGANISATION

This statement applies to *SSLP Group Ltd* (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2022.

B) ORGANISATIONAL STRUCTURE

Each member of staff works from their home office in a remote or virtual office model. The Organisation is controlled by a Board of Directors. Beneath this are the senior managers and then the remaining staff. A copy of the Organisation chart can be found in the ISMS and is available to external sources by request.

Current members of staff are geographically split evenly between the North and the South.

The main activity carried out by the Organisation is the provision of secure, encrypted document exchange via email and personal portal. The Organisation carries out this provision either directly with a client or via resellers. There tends to be no clear seasonal change in demand for the provision.

The labour supplied to the Organisation in pursuance of its operation is carried out in the UK in all regions.

C) DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly

adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK, and in many cases exceeds those minimums in relation to its employees.

E) SUPPLY CHAINS

In order to fulfil its activities, the Organisation's main supply chains include those related to provision of website services, provision of cloud infrastructure and supporting software and services associated with Employment Law such as staff payroll and pension. Each member of the supply chain is contracted directly with SSLP Group Ltd, is risk assessed and reviewed annually according to the requirements of the Third Party

F) POTENTIAL EXPOSURE

The Organisation considers minimal points of exposure to the risk of slavery and human trafficking to exist. Suppliers are subject to local Employment Laws in place at the time of issue and are subject to regular review.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

G) STEPS

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- measures in place to identify and assess the potential risks in its supply chains;
- undertaking impact assessments of its services upon potential instances of slavery;
- creating action plans to address risk to modern slavery;
- any actions taken to embed a zero-tolerance policy towards modern slavery;

H) KEY PERFORMANCE INDICATORS

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

Monitoring business news with regard to breaches of behaviour by any Third-Party supplier within our supply chain



- Annual reviews of performance and supplier conduct according to the requirements of ISO27001
- Open door policy for all staff
- Recruitment and employment process in line with current standards and monitored by external HR company
- Close working relationships with all staff (small business)

I) POLICIES

The Organisation has this policy statement held within the HR Policies area of the ISMS.

<https://intranet.sslpost.com/confluence/display/SSC/Modern+Slavery+and+Human+Trafficking+Policy+Statement>

J) TRAINING

The Organisation provides the following training to staff to effectively implement its stance on modern slavery:

- Induction
- Employee handbook and supporting policies
- Regular updates and full access to all policies defined by the Organisation within the ISMS

K) SLAVERY COMPLIANCE OFFICER

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation obligations in this regard. This person is the CEO.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval 01/01/2022 Signed by CEO