

MODERN SLAVERY STATEMENT



Introduction

The Modern Slavery Act 2015 (the 'Act') requires each business with an annual turnover of over £36m to publish a transparency statement which sets out the steps they have taken to ensure there is no modern slavery in their own business and in their supply chains. This statement is made pursuant to the Act.

We strive to be a great place to work for Fluid (EM) people. We want our employees to be fully engaged with our Company and motivated to give their all and we want their contribution to be recognised and rewarded.

We will therefore not tolerate forced, bonded or compulsory labour, human trafficking and other kinds of slavery within our own operations or within our supply chain and are committed to taking appropriate steps to ensure that everyone who works for Fluid (EM) – in any capacity – benefits from a working environment in which their fundamental rights and freedoms are respected.

Our approach to preventing modern slavery forms part of our wider corporate responsibilities. As Director of Fluid (EM) I am responsible for oversight of Fluid (EM) corporate responsibilities. We adopt procedures that contribute to ensuring modern slavery does not occur in our business or supply chains and we expect organisations with whom we do business to adopt and enforce policies to comply with the legislation.

Our structure and supply chains

Fluid (EM) is a single entity incorporated in the UK with no subsidiary undertakings. We are predominantly UK and Ireland focused. We provide corporate and public sector organisations with software licensing, workplace technology, networking and security, and cloud and datacentre. We do not develop bespoke applications or specialise in any industry-specific vertical application but can partner with third party organisations for these requirements.

We work as a team and in partnerships to bring the latest and broadest range of technology to our customers.

Our business comes from the small to medium-sized business segment and public sector customers.

Our procedures

Given the nature and locations of our business, we consider ourselves to be at low risk of the potential for slavery or trafficking. Furthermore, our revenues are predominantly derived from countries deemed low risk by conventional sustainability indices, such as *The Global Slavery Index* (<http://www.globalslaveryindex.org/index/>). We also believe that the Fluid (EM) business model and strategy is unlikely to create material risks of slavery and trafficking.

We have a number of procedures in place which we consider to be effective to prevent modern slavery from occurring in our business or supply chains.

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Employment

- We treat our employees in a fair, lawful and professional manner and provide for fairworking conditions, including health and safety, holiday entitlements and benefits.
- Robust recruitment processes are taken in line with employment laws, including: 'right to work' document checks; contracts of employment and checks to ensure everyone employed is 16 and above. We also make sure our people are aware of their contractual and statutory employment rights.
- Market-related pay and rewards are reviewed annually.

Transparency in our supply chains

As part of our initiative to identify and to mitigate risk:

- We have sought confirmation by our top suppliers (who work for us providing products and/or services for our own business use), in terms of spend, of their compliance with the Act.
- We operate a Supplier Code of Conduct, used for all new major suppliers or in re-tendering, which addresses the labour rights issues associated with modern slavery and sets out the values and standards we expect of our suppliers. We have included a declaration to confirm support of the Code or where they have their own codes in place, sought confirmation they are complying with the same standards that we adhere to.

Supporting our people

Our Employee Handbook requires all of us to act ethically and we expect employees to comply with legal requirements at all times, putting our values into practice in everything we do.

Further steps

Fluid (EM) does not consider that the risk of the potential for slavery or trafficking has increased for the business as a result of the COVID-19 pandemic. We continue to focus on the health, safety and wellbeing of our employees and to maintaining responsible relationships with our suppliers during the pandemic.

We plan to implement the following in 2022 to further guard against the risk of modern slavery and trafficking:

- The latest published modern slavery statements of our key vendors / suppliers (and where appropriate, other policies, such as their responsible minerals policy) will be reviewed as part of an ongoing assessment of risks within our supply chain.
- Additional training within the Procurement function.
- A further review of our Supplier Code of Conduct.

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This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 July 2020. It was approved by the Fluid (EM) Board with effect from 31 January 2022 and signed on its behalf by:

A handwritten signature in black ink that reads "John Baines".

John Baines

Director

31 January 2022