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## Modern Anti-Slavery Statement

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## M-Tech Systems Limited (“M-Tech”) – Statement on Slavery and Human Trafficking for Financial Year 2022/23

### Introduction

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

This statement is made pursuant to the Act and sets out the steps that M-Tech Systems Ltd (‘M-Tech’) have taken to ensure that slavery or slavery-like practices, forced labour and human trafficking is not taking place in our supply chains or in any part of the M-Tech business.

At M-Tech we strive to be a great place to work. We therefore do not tolerate forced, bonded or compulsory labour, human trafficking and other kinds of slavery within our own operations or within our supply chain. We take measures to ensure that everyone who works for M-Tech – in any capacity - benefits from a working environment in which their fundamental rights and freedoms are respected. We expect the organisations with whom we do business to equally adopt and enforce policies to comply with the legislation.

### About Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It is the severe exploitation of other people for personal or commercial gain. Modern slavery is all around us, but often just out of sight. From the outside, it can look like a normal job. It is an international crime, affecting millions of people around the world and transcends age, gender, and ethnicities. Sadly, across the globe, vulnerable people are forced to work illegally against their will in many different sectors from agriculture, construction, hospitality, retail, manufacturing, and more.

### Our Organisational Structure and Supply Chains

M-Tech Systems Ltd, founded in 2003, is a specialist technology service provider based in Eastbourne, East Sussex. Our managed services include traditional PC and server systems, cloud computing, networking infrastructure, cyber security, disaster recovery and so much more.

M-Tech is a private company limited by guarantee under the Companies Act 2006. We have approximately 35 permanent employees, all of whom work in the United Kingdom. We occasionally employ contractors. Our employment policies ensure fair treatment of our people regardless of their employment status with us. We partner with more than 50 different hardware and software vendors to offer the latest technology services to our customers.

We are also an internet service provider engaged with numerous specialist service providers in this field. Our external suppliers are mainly UK companies in low risk sectors such as professional services, technology and engineering.

Our business comes predominately from small to medium sized businesses and public sector customers across the UK. We also serve some large enterprises. The registered office of M-Tech Systems is Martello House, Edward Road, Eastbourne, East Sussex, BN23 8AS, United Kingdom.

## Our Procedures

M-Tech takes a zero-tolerance approach towards slavery and human trafficking and expect all those in our supply chain (and contractors) to comply with the Modern Slavery Act 2015. Our operations predominately fall within countries deemed low risk by studies such as the [Global Slavery Index 2018](#), therefore we consider ourselves to be at low risk of the potential for slavery or trafficking.

We have a number of policies in place which we consider to be appropriate to our business and effective in preventing modern slavery from occurring in our business or supply chains. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values and include:

- A 'Modern Slavery Policy'. All members of M-Tech are expected to report any concerns relating to slavery or human trafficking in line with the company Modern Slavery Policy. This sets out the key issues and process for responding both internally and externally.
- A 'Business Ethics Policy'. This contains our commitment to act with integrity and in accordance with all relevant legislation and statutory requirements.
- Employment Policies which promote a fair and inclusive workplace, including: the 'Equal Opportunities Policy' and 'Equality and Diversity Policy'. We treat our employees in a fair, lawful and professional manner and provide for fair working conditions, including health and safety, holiday entitlements and benefits, as detailed in our Employment Contracts.
- A 'Recruitment Policy' which follows current employment laws and ensures the appropriate document checks.
- A 'Whistleblowing Policy'. This is designed to make it easy for all staff to make disclosures, without fear or retaliation. Anyone with concerns is encouraged to raise them directly.
- We offer market-related pay and benefits which are reviewed annually.
- M-Tech also adopts the principles of the Ethical Trading Initiative Base Code of labour practice; namely:
  - Employment is freely chosen
  - Freedom of association and the right to collective bargaining are respected
  - Working conditions are safe and hygienic
  - Child labour shall not be used
  - Living wages are paid
  - Working hours are not excessive
  - No discrimination is practiced
  - Regular employment is provided
  - No harsh or inhumane treatment is allowed
- A process for resolving complaints raised by M-Tech customers.
- A 'Supplier Code of Conduct' clarifying the standards we expect.

## Due Diligence

All reasonable efforts are undertaken to ensure that slavery and human trafficking is not taking place in our supply chains. We aim to identify and assess potential high-risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring through implementing the following:

### 1. Contracts

M-Tech's preference is to always use our own contract terms rather than a supplier's, as this provides us contractual protection. This ensures our suppliers are aware of M-Tech's position in relation to slavery and human trafficking and permits M-Tech to terminate any agreement where it is confirmed that there is slavery or human trafficking involved.

M-Tech reserves the right to terminate any supplier agreement if there is any slavery or human trafficking involved.

### 2. New Supplier Investigation

When we welcome a new supplier to M-Tech, we engage a thorough due diligence process to ensure they have a good reputation and appropriate policies and procedures in place. All new suppliers are required to confirm that no part of their business operations contradicts our Modern Slavery Statement on engagement.

We expect our suppliers to confirm to us that:

- They have taken steps to ensure there are no modern slavery practices within their business.
- They hold their own suppliers to account over modern slavery.
- If UK-based, they pay their employees at least the national minimum wage/national living wage.
- If international suppliers, they pay their employees any applicable minimum wage to their country of operation.

### 3. Reporting

M-Tech Systems Ltd takes all allegations of slavery and human trafficking seriously. As such, M-Tech encourages the disclosure of information about malpractice/ wrongdoing occurring. Any concerns in this area can be raised directly with the CEO by emailing: [martin.lulham@mtechsystems.co.uk](mailto:martin.lulham@mtechsystems.co.uk).

## Key Performance Indicators (KPIs)

As per our Whistleblowing Policy we log complaints received, along with the actions taken.

We have adopted the following KPIs to inform us if the steps we are taking are effective. We will know, to the best of our knowledge, that modern slavery is not taking place within our business operations or supply chain if:

- No reports are received from our employees.
- No reports are received from the public or our customers.
- No reports are received from any legal bodies.

As of the date of this statement, M-Tech have identified no instances of modern slavery.

## Next Steps

To ensure that M-Tech Systems Ltd is successful in preventing slavery or human trafficking in any of their supply chains, M-Tech will continually review relationships with all suppliers and will assess any concerns of slavery or human trafficking on a case-by-case basis.

**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 30 September 2024.**



Martin Lulham,  
CEO M-Tech  
Systems Ltd

UPDATED September 2023.