



Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 01 May 2021 to 30 April 2022.

The statement sets down Grey Matter Ltd.'s commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Purpose

Grey Matter Ltd ("the Company") operates a zero tolerance to slavery and human trafficking.

This statement is made in relation to the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the current year.

Grey Matter Ltd expects all those in our supply chain to comply with our values and to have suitable anti-slavery and human trafficking policies and processes.

This statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Scope

This statement applies to Grey Matter Ltd, its employees and managers, and extends to any organisation or individual that Grey Matter Ltd conducts business with.

Organisational structure and supply chains

This statement covers the business activities of Grey Matter Ltd which are as follows:

The Company consists of three areas of business. Selling developer and technical software to businesses, distribution of software to resellers and also deliver professional services and support.

The Company operates in the UK but sells worldwide, except to IT embargoes countries.

The Company has reviewed all associated partners and considers our business dealings to be low risk.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 Policies: HR Manager is responsible for creating and reviewing policies. The process by which policies are developed is to look at best practices, taking external advice and creating a policy which is reviewed and agreed by Senior Leaders.
- 1.2 Risk assessments: The Office Manager and HR Manager are responsible for risk assessments in respect of human rights by a process of reviewing individuals and completing Risk Assessment documentation.
- 1.3 Due diligence: The Vendor Manager is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.
- 1.4 The Senior Leadership Team are accountable for making sure the company is acting with due diligence and will ensure any risk assessments are carried out prior to engaging with suppliers and customers.
- 1.5 The Senior Leadership Team are responsible for supply chain verification for existing and future suppliers in relation to the Modern Slavery Act.
- 1.6 All Team Leaders, Heads of Department, Senior Managers and the board will have training on modern slavery and the implications for the Company.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to complete Modern Slavery and Human Trafficking training on their first day of joining the during Induction. Thereafter all Staff will receive mandatory annual Modern Slavery and Human Trafficking training.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

2.1 **Protected Disclosure Whistle Blowing Policy (20180104)**

[Protected Disclosure Whistle Blowing Policy Link](#) - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.

2.2 **The Company Code of Ethics and Business Conduct** [Wayside Code of Ethics Business Conduct](#)- The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.

2.3 **Corporate Social Responsibility (CSR) Statement** [Corporate Social Responsibility Statement](#) The Company's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes Contract Compliance, building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all [relevant] staff to have completed training on modern slavery as soon as they start with the Company.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated, as necessary. Andrew King, Jane Silk, Matthew Whitton, and Caroline Knott endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Valid for:	01.05.2021 – 30.04.2022
Review and consultation process:	Annually from approval date above. The Senior Leadership Team to review and ensure that findings of any risk assessments are taken into consideration and that the statement remains relevant.
Responsibility for Implementation & Training:	People and Culture Department
Distribution:	Intranet for internal communications, web site and emailed link for affected business partners.

Statement Approved:

Signed: *Andrew King*

Date: Jun 29, 2021