

# MODERN SLAVERY AND HUMAN TRAFFICKING

## POLICY STATEMENT

### Policy Statement

In accordance with the Modern Slavery Act 2015, 360Globalnet Limited and its subsidiary companies (“360GL”) are committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (collectively “human trafficking and slavery”). It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices.

Modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, forced and compulsory labour and human trafficking all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain.

360GL have a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or supply chains. 360GL expects the same high standards from all its contractors, suppliers and business partners and expects them to hold their own suppliers to the same high standards.

This policy applies to all employees along with all persons working for 360GL or on its behalf in any capacity, including external consultants, contractors, business partners, suppliers and any other third-party representatives (suppliers).

### Organisation’s Structure and Responsibility for the policy

360GL supplies software services to capture data by means of video, photographic and text whilst our subsidiary companies perform the duties of drainage investigations and repairs plus document storage/retrieval using our cloud-based solution.

360GL’s Officers and HR Controller are committed to ensure that slavery and human trafficking does not exist within 360GL’s workforce or any part of its supply chain.

### Supplier Responsibilities

All suppliers are required to adhere to the following:

- 360GL expects its suppliers to meet high standards of business practices, environmental responsibilities and operational excellence;
- Suppliers will not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily, under threat of penalty;
- Suppliers will ensure that the overall terms of employment are voluntary;
- Suppliers will comply with the minimum age requirements prescribed by applicable laws.

## Internal Recruitment

360GL have a robust internal recruitment procedure in place for the vetting of new employees to ensure that our own workforce comply. Employees are treated fairly, and employment practices are based on equal opportunities for all employees. 360GL respect the interest of its employees and treat all employees with dignity and respect. 360GL is committed to providing safe and healthy working conditions and an atmosphere of open communication for all our employees.

## Compliance with the policy

Employees of 360GL and its suppliers (“Participants”) must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the business or supply chain is the responsibility of all Participants. Participants are required to avoid any activity that might lead to or suggest a breach of this policy and must notify the Officers as soon as possible if there is a belief or suspicion that a conflict with this policy has occurred or may occur in the future. This information will be treated in the strictest confidence.

It is 360GL’s policy to communicate its zero-tolerance approach to modern slavery to all employees, suppliers, contractors and business partners at the outset of any relationship with them and reinforce it as appropriate thereafter.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2021.



Paul Stanley  
Chief Executive Officer

4<sup>th</sup> January 2021