

Insurgo Media Services Limited

Modern Day Slavery Statement

This statement is made pursuant to s54 of the Modern Slavery Act 2015 and sets out the steps that Insurgo Media has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Insurgo Media has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

About the Organisation

Insurgo Media are one of the leading providers of tape media supply, secure data destruction and data disposal services in Europe. We carry out business globally as well as the UK and EU regions. The company employs 15+ employees operating from its premises at Roseheyworth Business Park, Abertillery, Gwent.

Our Policies on Slavery and Human Trafficking

Insurgo Media is aware of our responsibilities towards our customers, employees and the local community and expect all suppliers of Insurgo Media adhere to the same ethical principles.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our internal policies replicate our commitment to acting ethically and with integrity in all our business relationships. All approved suppliers complete a Credit Application Form which includes our terms and conditions of business which contain a provision around Good Industry Practice to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chains; and that they conduct their businesses in a manner that is consistent with Insurgo Media's anti-slavery policy.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff, and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will;
2. Equal Opportunities. We have a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities;
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals
4. Code of Business Principles and Policies. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our Suppliers

Insurgo Media operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due

diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on-site audits which include a review of working conditions].

Our Modern-Day Slavery Statement forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (International suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Due Diligence

To ensure all those in our supply chain and contractors share our values we have in place a supply chain compliance programme.

This consists of:

- Annual reviews with our suppliers
- Partnership agreements allowing greater transparency through partnership working

We have appointed the Business and Compliance Manager the responsibility to our Directors for overseeing compliance with the Modern Slavery Act and annual preparation of the Modern Slavery Act Transparency Statement.

Our Business Process and Quality, Human Resources and Procurement departments are also involved with ensuring the robustness of modern slavery and human trafficking compliance within Insurgo Media.

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 ending 31st July 2018.



Gavin Griffiths

Managing Director
12th March 2018

This Statement will be reviewed on an annual basis.