

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 30 June 2024.

4Net Technologies Ltd. ('the Company', 'we', 'us' or 'our') T/A FourNet is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

### Organisational structure

4Net Technologies Ltd. has business operations in the United Kingdom. We operate in the IT and Telecommunications sector. The nature of our supply chains is as follows: ***We work with a number of key direct suppliers, who provide goods and services to facilitate our commercial commitments, such as Cloud and Contact Centre Solutions, equipment and solutions, IT and Telecoms software and associated services, to offer seamless and transparent service provisions that meet client needs.***

For more information about the Company, please visit our website: [www.fournet.co.uk](http://www.fournet.co.uk).

### Policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- **Recruitment and selection policy** - We conduct checks on all prospective employees to verify that they are eligible to work in the UK. Certain roles require a Disclosure and Barring Service (DBS) check, which is conducted by the individuals that require them.
- **Supplier code of conduct** - We operate this policy to ensure our suppliers operate in full compliance with the laws, rules and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain. We also request that they have a knowledge, understanding and commitment to the Modern Slavery Act 2015.

- **Modern Slavery, incorporating Whistleblowing policy** - We operate this policy so that employees can raise concerns about how staff are being treated or practices within our business or our supply chains without fear of reprisal.
- **Staff code of conduct** - We are committed to the fair treatment of all staff. Our staff code of conduct reflects our core values and expected behaviours. The code of conduct makes it clear that we have a zero-tolerance approach to modern slavery.
- **Procurement policy** - We want to make sure that potential suppliers are committed to ensuring that slavery and human trafficking is not taking place within their own supply chains. Our procurement policy and supporting procedures set out controls and checks undertaken to help verify this.
- **Safeguarding policy** - This policy highlights the potential risks of modern slavery and human trafficking, including how to identify signs of exploitation and how to report concerns.

We make sure our suppliers are aware of our policies and adhere to the same standards.

## **Due Diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.
- External supplier audits, as part of our Supplier Management Reviews.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistle-blowers.

## **Risk and compliance**

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its immediate UK supply chain, by conducting Supply chain mapping.

We and our direct supply chain do not match any of the Generic Business Patterns outlined in the NSA's Indicators of Modern Slavery and Human Trafficking, and as part of our supplier management, we conduct profile screenings based on these indicators, to ensure that this remains constant.

We do not tolerate slavery and human trafficking in our supply chains. Regular Supplier reviews and our own internal audits and supplier assessments allow us to monitor and

measure our suppliers, to ensure aligned integrity and corporate codes of Business are in place, for mutual compliance. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

## Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact our strategic suppliers to enquire about their modern slavery practices every 12 months.
- We will train our staff about modern slavery issues and increase awareness within the Company.
- We will carry out a regular audit of 10% of suppliers each year, to check on their policies and their focus on slavery and human trafficking.

KPI	Outcome Status	Notes
Strategic Supplier Contact	KPI Met	Our strategic suppliers were contacted during this period
Modern Slavery training	KPI Met	Modern Slavery e-learning is conducted by all employees and a dedicated online information Portal has been produced to inform and educate our employees about Modern Slavery and Human trafficking, with videos and information available, to reinforce and educate us, that is updated regularly throughout the year.
Audit Findings of 10% of our suppliers	KPI Met	Our audit results showed that the sample of our suppliers all had in place policies and/or Modern Slavery Statements in place, that could be evidenced, or were working towards publishing one within the next 12 months.

## Training our staff



The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies, including their removal from the Company's supply chain.

The statement was approved by the board of directors.

Signed by:

A handwritten signature in black ink, appearing to read "Richard Pennington".

Richard Pennington, Director  
4Net Technologies Ltd.  
Date: 5th December 2023