



Human Resources

Modern Slavery and Human Trafficking Statement

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do amazing things

1. Anti-slavery and anti-trafficking statement for the financial year ending 30th June 2017.

This statement is made on behalf of Claranet Group Limited and Claranet Limited pursuant to S. 54, Part 6 of the Modern Slavery Act 2015 ("the Act"). This statement sets out Claranet Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring no slavery or human trafficking exists in its own business or its supply chains.

Background

Claranet is a leading managed IT service provider in Europe and Brazil. We offer businesses hosting, networks, communications and security services. We deliver high quality solutions across a wide range of industries.

Claranet adheres to the letter and spirit of all applicable legislation. Further, it is the company's policy to conduct its business in line with the highest ethical standards.

Claranet is committed to combatting slavery and human trafficking and to acting with integrity in all of our relationships. We have a zero-tolerance approach to human rights abuses as dealt with under the Act, in both our organisation and our supply chains. The company is aware that as an employer, and as a part of each of the communities in which our sites are located, it is critical that we tackle and address the issue of human rights abuses in line with increasing global focus in this area.

Claranet Structure

The company, its subsidiaries and affiliated companies operate in the United Kingdom, France, Portugal, Italy, Germany, The Netherlands, Spain and Brazil and provide services to clients in these and many other countries. Due to the nature of our services, our supply chain is complex and our network of suppliers is extensive.

As a business we are committed to acting responsibly and supporting the objectives of the Act. We have established a Modern Slavery and Human Trafficking Policy to embed this commitment. Claranet aims to review our standard procurement and contractual documentation to enable us to strengthen our position in relation to these matters. We endeavour to implement certain systems and controls aimed at ensuring modern slavery is not taking place anywhere within our company or in our supply chains. We aim to communicate to our suppliers our expectations they they will hold themselves to similar standards and show progress and compliance in this area. These aims are set out below:

Due Diligence

The company currently carries out detailed due diligence prior to on boarding a new strategic supplier. We are broadending this process with expanded investigations. We aim to establish what form these investigations may take based on what is suitable for the assessed risk profile of the individual supplier. The company seeks to maintain a zero tolerance approach in relation to failings around human rights abuses which may become evident during the due diligence process.

Policies

To support our compliance and strength in this area Claranet aims to have in force:

- A supplier code of conduct;
- A Modern Slavery Policy and Human Trafficking Policy;

alongside existing policies in force as support to the spirit and aims of the Act

- Equal Opportunities policy;
- Recruitment policy;

Risk Assessment; Audit

We aim to undertake risk assessments in relation to certain key suppliers to better understand any perceived risk level in a given relationship. Claranet aims to bolster its auditing rights and abilities to better satisfy the company as to the practices and procedures of its suppliers.

Contractual Remedies

The company endeavours to introduce contractual rights and remedies into certain strategic supplier relationships in order to strengthen and support our compliance with and endorsement of the Act's aims.

Training

We are committed to ensuring that Claranet personnel are equipped to understand the implications of possible human rights abuses as dealt with under the Act, whether in our business or our supply chains, and to identify risk factors and escalate appropriately.

To maintain awareness and ensure a high level of understanding of the risk of modern slavery and human trafficking in our business, our statement and policy is included in our employee handbook.

We aim to provide training and ongoing updates through Company Inductions, Internal training and policy documentation to:

- Senior leadership team;
- All staff
- Dedicated sourcing and procurement colleagues;
- Subject matter experts holding key relationships with our supply base.

Senior Sponsorship

The company aims to establish a corporate responsibility board including members of staff with responsibility for supply chain and people compliance. This board is responsible for drafting and rolling out a corporate strategy in relation to our compliance with and support of the Act.

Our executive leaders are determined to run our business responsibly and to implement procedures and policies to tackle human rights abuses in this area.

Signed by and on behalf of Claranet Group Limited and Claranet Limited

Director: 