

Introduction

This statement is published annually in line with section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by The ESP Group to ensure continued commitment to business operations which are free from involvement with slavery or human trafficking.

In addition to producing the annual statement, The ESP Group is committed to:

- ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility
- ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure
- carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK
- ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act
- appointing a named individual to oversee the compliance with the Modern Slavery Act
 2015 (this person is Kerri Price, Head of People and Policy)
- · identifying and addressing any areas of high risk in our supply chain
- providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.



About The ESP Group

The ESP Group consists of two industry-leading companies: Journeycall, a non-scripted blended contact centre service and Systex, a software and smart token company offering smartcard production and bureau services. As an outsourced partner of choice, we offer true peace of mind to clients and customers through bespoke customer care solutions.

Our Commitment to the Principles of the Modern Slavery Act 2015

We commit to being Financially Sustainable, Agile, Accountable, Transparent and to maintaining the highest of ethical standards through continual improvement of Group policies and process to avoid any potential complicity in human rights violations related to our operations or supply chain.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

As an equal opportunities' employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our teams.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

Our commitment to human rights, including our position on forced labour, involuntary labour, child labour, and human trafficking, is outlined in our Ethical Trading, Social Accountability, Health & Safety, Equal Opportunities and Recruitment policies.

Our principles related to human rights include:

- We are committed to protecting and preserving the rights of our employees, those employed in our supply chain, and those affected by our operations;
- We believe that all employment should be freely chosen and commit to refrain from any form of forced or involuntary labour;
- We are opposed to the use of any form of child labour or practices that inhibit the development of children.

Our Supply Chain

We have considered the exposure of The ESP Group to slavery and human trafficking risk, taking into account:



- Limited direct and supply chain operations in countries with a high prevalence of modern slavery, informed by third-party external sources including the Global Slavery Index:
- Highly-skilled nature of the activities and roles undertaken across the Group, and the skill set and qualifications required to perform these activities, reducing our exposure to temporary or low-skilled agency employment;
- The application of our Group policies and processes, including procurement and recruitment processes;
- Assessment of any concerns or incidents logged through our whistleblowing or public interest disclosure reporting process.

As a result of the factors above we consider the risk of slavery or human trafficking occurring within our direct employee population, business operations and tier one supply chain to be low.

Our policies in relation to the Modern Slavery Act 2015

Our values, guiding principles and code of conduct underpins all ESP Group activity and apply to all employees. The Code exists to ensure all staff act in an acceptable manner and are treated equally and fairly by other employees and by the company.

Our Ethical Trading and Social Accountability policy sets out our commitment to respect the human rights of our employees and those working on our behalf through core labour standards.

Other policies also exist which demonstrate The ESP Group commitment to human rights; these include the Equal Opportunities policy; Health & Safety policy; Recruitment policy; Corporate Social Responsibility Framework, Safe Guarding & Public Interest Disclosure policy. Each provides guidance for the implementation of processes and highlights relevant related policies.

We extend our standards into our external supply chain and ensure adherence through our contractual terms.

Continued Commitment

The ESP Group will continue to demonstrate our commitment by;

- providing awareness training to our teams of all ESP Group policies related to principles of the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring those involved in procurement activity are aware of and follow <u>modern</u> slavery procurement guidance on GOV.UK



- ensuring that consideration of the modern slavery risks and prevention are added to internal review process as an employer and procurer of goods and services
- continuing to take action to embed a zero-tolerance policy towards modern slavery
- ensuring that teams involved in the recruitment of employees receive regular training on modern slavery and ethical employment practices

Conclusion

This statement ensures that The ESP Group complies with section 54 of the Modern Slavery Act 2015, and sets out the responsibilities for employers and employees.

The ESP Group is committed to ensuring that all of its business operations are free from involvement with slavery or human trafficking.

Theresa Slevin, The ESP Group Chief Executive Officer

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