



# MODERN SLAVERY POLICY

VERSION 10  
Issued 24.04.2024



This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that CMYK Digital Solutions Limited (CMYK) has taken and is continuing to take to ensure 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. CMYK 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.

### **Our business**

CMYK's business is the supply and maintenance of IT services and multifunctional devices primarily to the UK market but also to the Republic of Ireland. CMYK's operations are based out of its head office in Bonnyrigg, Scotland with field offices been based in Glasgow Warrington and satellite offices in London and Aberdeen.

CMYK's business does not operate at any international level; all of its recruitment and procurement is conducted solely within United Kingdom. All of CMYK's suppliers are UK-based, most are well known multinational organisations. As part of our supplier engagement due diligence, modern slavery compliance is checked and confirmed.

### **Our high-risk areas**

Due to the nature of CMYK's operations there are no perceived high-risk areas. This is kept under constant review by the Board of Directors and reviewed periodically by the operations team.

### **Our policies**

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

1. This Modern Anti-slavery policy.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Conduct policy. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

## Our suppliers

CMYK 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. Our anti-slavery policy 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 engagement 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. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. We may cease the engagement at any time should any instances of modern slavery come to light

## Training

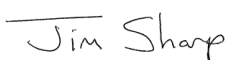
We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

## Approval for this statement

This statement was approved by the Board of Directors on 24th of April 2024.



Jim Sharp  
Managing Director

24th April 2024