

E2BN MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At E2BN, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2019.

Our business and supply chains

Business: East of England Broadband Network (E2BN). E2BN Protex Ltd trading as Internet4schools

Our business activities:

- Provision of and support for broadband and filtering to schools, academies and other public sector organisations
- Provision of training for school staff
- E2BN operates in the UK

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Risk assessment

E2BN acknowledges that it is at the beginning of its AMS journey. This year we have audited the first tier of our supply chain by:

- Checking supplier websites for Anti Modern slavery and Human trafficking statement
- Contacting suppliers that do not display Anti Modern Slavery and Human Traffickings statements
- Including an attestation of compliance with the AMS Act 2015 in all our tendered contracts

E2BN MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Policies

E2BN operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. Details of how to report concerns can be found in the employee handbook
- Supplier Contracts to make explicit reference to slavery and human trafficking

Supplier due diligence

E2BN conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Auditing the suppliers for compliance with the Anti Modern Slavery and Human Trafficking
- We require all contracted suppliers to attest that:
 - They comply with Modern Slavery Act 2015
 - They have not committed an offence under the Modern Slavery Act 2015 (an “**MSA Offence**”); or
 - been notified that it is subject to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015; or
 - is aware of any circumstances within its supply chain that could give rise to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015,
 - shall notify E2BN immediately in writing if it becomes aware or has reason to believe that it, or any of its officers, employees, agents or sub-contractors have breached or potentially breached MSA

E2BN MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Awareness

E2BN has raised awareness of modern slavery issues by sharing this statement with all staff. All staff have received a briefing on:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Training

In addition to the awareness programme, E2BN has rolled out a face-to-face training course to all employees, which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking

Measuring how we're performing

E2BN has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training?
- How many suppliers have Anti Modern Slavery and Human Trafficking policies?

This statement covers 1 April 2019 to 31 March 2020 and has been approved by the board of E2BN at the board meeting on 19th May 2020.

Signed

Jonathan Lewis – Chair of E2BN

A handwritten signature in black ink, appearing to be 'Jonathan Lewis', written over a light blue horizontal line.

19/05/2020