



What is modern slavery?

Modern slavery is an international crime, affecting millions of people around the world - a growing global issue that transcends age, gender and ethnicities. Sadly, vulnerable people from overseas as well as across the UK, are forced to work illegally against their will across many different sectors from agriculture, construction, hospitality, retail, manufacturing, and more.

Our organisation structure and supply chains

At Excel Voice & Data Ltd, we understand the importance of complying with the Modern Slavery Act 2015 (the "Act"). We have, for several years, taken steps to ensure the requirements of the Act were implemented, not only throughout our business, but throughout our supply chain as well. Today, as a private company limited by guarantee, incorporated in England and Wales, we are committed to running our business responsibly, with the same ethical principles that our customers and suppliers have come to expect. We continue to respect all human rights and encourage the highest possible standards throughout our supply chain. This statement describes our business and supply chain and how we operate them. We explain our current policies and practices and the plans that we have to continue to enhance these in support of the Act.

Beliefs and Principles

We maintain our long-standing commitment not to use or accept forced, bonded or involuntary prison labour or child labour, nor do we demand deposits or hold onto our workers' identity papers – or work with businesses that do. We only work with people who believe in the right to work freely. We welcome feedback from our employees and suppliers, including in relation to any suspicion or knowledge of unethical behaviour. We make it easy to report concerns either via their line manager, our Human Resources department, or via our Risk and Compliance team. Additionally, we provide an independent whistleblowing service that enables staff to anonymously report concerns, including any for modern slavery or trafficking.

Our Business and Supply Chain

We are a UK based provider of telecommunications, IT and cloud services, employing 1-10 employees. The nature of our business requires us to engage with a wide range of suppliers to source items and services including our network and IT hardware through to our waste disposal services. Many of our supplies have their own suppliers which means that we are one part of a complex supply chain. In order to comply with the requirements of the Act, we prioritise our attention on companies that supply high-value products or services, or things without which our business could not run.

How We Monitor Compliance

We aim to prevent modern slavery or human trafficking in our business right at the start of our recruitment process. Our recruitment policy is aligned with our principles outlined within our employee handbook and applies to all people hired regardless of whether this is via our internal recruitment team or through the use of external agencies.

Once people join us, we give our new employees plenty of support, education and training. All new starters are made aware of our ethical policies which are available through our intranet pages and are readily available to all employees. We have introduced our first ethical code of conduct that outlines our ethical standards for our employees, partners and suppliers.

Failure to behave in an ethical manner whilst working on behalf of Excel Voice & Data Ltd, in appropriate cases, will result in disciplinary action which could ultimately lead to dismissal.

Due diligence processes, risk assessment and management

The implementation of our policies and procedures includes due diligence on suppliers that we engage with, in accordance with our procurement policy. A heightened risk area is the use of hotel and conference facilities. To mitigate against this risk, we assess the companies that we deal with as part of the decision-making process for events and travel.

When we admit a new member firm to the Excel Voice & Data company, a thorough due diligence process takes place to ensure that the firm has a good reputation with appropriate practices in a number of areas including people and culture. Once admitted as member firms, compliance with global policies is a condition of membership.

Measuring Progress

At the heart of our strategy to measure progress for our Modern Slavery Act Statement lies an unwavering commitment to transparency and accountability. We regularly review and refine our due diligence procedures to reflect evolving best practices and emerging risks within the telecommunications, IT and cloud services sectors. Furthermore, we engage in ongoing dialogue with stakeholders, including civil society organisations and industry peers, to gather insights and feedback on our endeavours.

Through transparent reporting mechanisms, we openly communicate our progress and challenges, fostering trust and collaboration in our collective mission to combat modern slavery. By nurturing a culture of accountability, we aim to drive meaningful change and uphold our responsibility to respect human rights across our operations.

Training on modern slavery and trafficking

Excel Voice & Data provides periodic training to our people on the subject of modern slavery and our policies to address the risks to help increase education and awareness.

In 2024/25 we aim to:

- Send questionnaires to 5 critical suppliers asking them to confirm that they adhere to the principles within our Corporate Social Responsibility policy.
- Continue to strengthen our position through mapping against key Sustainable Development Goals.

We will publicly report on our progress against these objectives in our 2024/25 statement.

In the past year, our relentless commitment to upholding ethical standards has been evident as we diligently enforce controls to ensure our suppliers adhere to all relevant legislation, including the Modern Slavery Act. Through robust due diligence processes and continuous monitoring, we have worked tirelessly to mitigate the risks associated with modern slavery within our operations and supply chain.

Looking ahead, our focus extends beyond mere compliance as we aim to evolve and innovate in our approach. In the longer term, we are dedicated to refining our methods and developing more sophisticated measures to accurately gauge the effectiveness of our actions in combatting modern slavery. By striving for continuous improvement and embracing innovation, we reaffirm our steadfast dedication to promoting human rights, fostering transparency and contributing to a more just and equitable global community.

This statement was last updated 3 April 2024 and is valid until 31 March 2025.