

Modern Slavery Act 2015

Modern slavery and human trafficking statement



Introduction from the [DBaaS Limited, United Kingdom.]

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2018–2019.

Organisational structure

We are a provider of **Database Management as a Service and Support in the IT sector.**

DBAAS LTD MEANS DIGITAL BUSINESS AS A SERVICES MAJORLY CONCENTRATE ON DATABASE MANAGED SERVICES AND IT SUPPORT SERVICES AS A SME., OUR SERVICES IS MAJORLY IN UNITED KINGDOM.

We have a global annual turnover of £150,000.00

Our supply chains

Our supply chains include: DBaaS Limited operates a supplier policy terms and maintains a preferred supplier or sub-contractors list. We conduct due diligence on all suppliers or sub-contractors before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organization or sub-contractors checks any one of the 4 checks as BPSS, CTC, SC, NPPV 3 Clearance checks through Vetting unit, Warwickshire Police and Disclosure Barring Service, Home Office has never been convicted of offenses relating to modern slavery [and on-site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers, contractors, sub-contractors 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 contract with suppliers, sub-contractors, contractors we require that they confirm to us that:



The principles of the fundamental conventions on labour standards of the International Labour Organisation (ILO).



The principles of the UN Global Compact Programme And the "caring for climate" and "Women's Empowerment principles" initiatives.



The Organisation for Economic Co-operation and Development (OECD) guidelines for Multinational Enterprises

Risk Assessment

Assessment of risk of modern slavery within our organization

In 2017, we increased the detail of our risk assessment of our business by directly mapping the assessment of our employment practices in line with internationally recognised standards. Once again, our risk assessment revealed the risk of modern slavery in our UK business to be low. Our skilled and agile employees have greater control over their careers; and this significantly reduces the risk of modern slavery. We have a range of employment policies that protect and enhance our employee's experience at work.

We also considered the risk of modern slavery within our recruitment processes. In compliance with English law, our recruitment teams conduct a right to work check on all new joiners. This check is completed face to face so there is no need for the new employee to send off a passport or other identity documentation.

As we reported last year, external resourcing is a potential risk area for DBAAS LTD UK plc, although the highly skilled, specialist contractors we engage from time to time are at low risk of modern slavery offences.

Our commitment to the ILO Fundamental Principles of eliminating discrimination in respect of employment and occupation, is reflected in our "Call it Out" campaign (following on from "#Me too") run by our HR and Employee Relations experts. The campaign included training our executives and senior employees on how to tackle any unacceptable behaviour; not to be a bystander or enabler of discrimination or harassment but to lead by example.

In 2017, we achieved EDGE certification, the leading global assessment methodology and business standard on gender equality in the workplace and were named in the Times Top 50 Employers for Women 2017.

Assessment of risk of modern slavery within our supply chain

The risk assessment of the supply chain mapped the risk of modern slavery by commodity supplied and location of supply. The risk assessment was applied to all suppliers to DBaaS Ltd UK plc registered on the Global Procurement System (GPS) and therefore covered suppliers to all aspects of our business and organisation.

DBaaS Ltd UK has assessed its entire supplier base against our Core Principles of Sustainable Procurement. More than 95% of suppliers were found to meet our sustainability criteria; we no longer do business with the remaining 5%. Every new supplier is assessed for sustainability via an online survey.

Our 12 Core Principles of Sustainable procurement

Respect for Human rights	Compliance with applicable laws
Refusal of forced or compulsory labour	Refusal of child labour
Promotion of Equality and diversity	Employee wellbeing and development
Fair disciplinary practices	Freedom of association
Health and Safety	Confidentiality and intellectual property
Refusal of bribery and corruption	Reduction of Environmental impacts

Policies

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free on Modern Slavery and Human Trafficking Policy such as Responsible Sourcing Policy • Human Rights Policy • Environmental Policy • Anti-Bribery and Corruption Policy • Whistleblowing Policy • Health and Safety Policy • CSR Policy • Employee Code of Conduct • Supplier Code of Conduct • Recruitment/Agency workers policy [OR] we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

And ensure that Our Modern Slavery and Human Trafficking Policy [OR] our workplace policies and procedures should covers on such as

- a) They have taken steps to eradicate modern slavery within their business
- b) They hold their own suppliers to account over modern slavery
- c) (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- d) (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
- e) We may terminate the contract at any time should any instances of modern slavery come to light

as demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our Values & Ethics programme is about who we are and the way we do business.

Our seven core values and code of ethics underpin our corporate culture and permeates through our business practices, procurement behaviours and welfare policies.

Honesty

Boldness

Trust

Freedom

Fun

Modesty

Team Spirit

at the heart of everything we do

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk as

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.
- We regularly conduct **training** for our procurement/sub-contractors, contractors, our employee lead 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 and delivers to managed services and support services.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

STEPS TO ASSESS AND MANAGE RISKS

Acknowledge the parts of your business and supply chains where there is a risk of slavery/human trafficking taking place, and detail the steps taken to assess and manage that risk.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide [OR] intend to provide training to our staff. We also require [or] will insist our business partners to provide training to their staff and contractors and suppliers and providers.

Describe broadly in the training that has taken place either directly within the organization, sub-contractors, or with suppliers and others, to better understand and respond to the identified slavery and human trafficking risks.

As to explain in details with training sessions • How to assess the risk of slavery and human trafficking • How to identify the signs of slavery and human trafficking • What initial steps should be taken if slavery or human trafficking is suspected • How to escalate potential slavery or human trafficking issues • What steps the organization should take if suppliers or contractors do not implement antislavery policies in high-risk scenarios

We have a dedicated compliance in-house and outsourced teams, which consists of HR, counsellor and management representatives **OR** volunteer's involvement teams from the following departments:

- Legal
- Audit and compliance
- Human resources
- Procurement
- Finance and Sales.

The compliance team is led by Aru Kaya.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

We have appointed an independent third party, based on the review of quotes to conduct an externally facilitated review to bring insights on ways to we can tackle slavery and human trafficking. Opted third party ORGANISATION uses appropriate standard KPIs to assess how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

Further steps

Following a review of the effectiveness of the steps we have taken 2022/2023 to ensure that there is no slavery or human trafficking in our suppliers, contractors, sub-contractors, supply chains. we intend to take the any recommended further steps to combat slavery and human trafficking: to ensure there is no such identifying and tackling modern slavery issues and No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

A handwritten signature in black ink, appearing to be a stylized name followed by a horizontal line and a small flourish.

SIGNATURE / POSITION: FOUNDER & DIRECTOR.

DBAAS LTD

Date: 11/05/2023