

# MODERN SLAVERY

MODERN SLAVERY ACT 2015



# INTRODUCTION

Modern Slavery covers harassment through forced and compulsory labour and human trafficking in the supply chains of businesses. This Statement is made by “DBaaS Limited”, and its relevant subsidiaries, all collectively hereinafter referred to as “DBaaS” under Section 54 (1) of the UK Modern Slavery Act 2015, Section 3 of the Australia Modern Slavery Act, 2018 and any other applicable Modern Slavery regulations for the year ending 31 March 2024. We are committed to upholding human rights and the steps we have undertaken to ensure that slavery and human trafficking do not operate within our business or our supply chain.

DBaaS owns and runs an innovative IT service ([www.dbaasltd.com/](http://www.dbaasltd.com/)), founded in 2019, which provides services to businesses seeking to protect their operations and services from modern slavery.

We at DBaaS LTD have a zero-tolerance policy on modern slavery. We are committed to acting ethically and with integrity in every business interaction and relationship we have, as well as implementing and enforcing effective systems and controls to ensure modern slavery does not exist in our business or our supply chains.

As part of our disclosure obligations under the Modern Slavery Act, we are equally committed to ensuring transparency in our operations and in our efforts to combat modern slavery throughout our supply chains. Our contractors, suppliers, and other business partners are expected to meet the same high standards. We will continue to include specific prohibitions against forced, compulsory, or trafficked labour, as well as slavery and servitude, whether adults or children, in our contracting processes, and we expect our suppliers to hold their suppliers to the same high standards.

All employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners who work for us or on our behalf are covered by this policy.





# ORGANISATIONAL STRUCTURE

We are a provider of database management services and support in the IT sector.

DBAAS LTD MEANS DIGITAL BUSINESS AS A SERVICE MAJORLY CONCENTRATES ON DATABASE MANAGED SERVICES AND IT SUPPORT SERVICES AS AN SME., OUR SERVICES ARE MAJORLY IN THE UNITED KINGDOM.

## POLICIES

We have reviewed and archived many legacy policies to reduce the number of overall policies from 130 to 54, improving clarity for staff.

We are reviewing our entire policy database by restructuring the documents to separate high-level policies set by the trustees from procedures led by staff. Those most relevant to modern slavery are:

- Safeguarding Policy (Children and Adults)
- Equity, Diversity & Inclusion
- Recruitment
- Conflicts of Interests
- Incident Reporting
- Whistleblowing
- Anti-Bribery
- Risk Management
- Supplier Code of Conduct
- Modern Slavery Policy
- Criminal Practices and anti-money-laundering
- Staff Code of Conduct



## OUR COMMITMENT

We recognise that modern slavery is a significant global human rights issue and includes human trafficking, sexual exploitation, forced and bonded labour, some forms of child labour, and domestic servitude. Our commitment starts with protecting and respecting human rights and taking action to prevent slavery and human trafficking in all their forms. We will act ethically and with integrity in all our relationships, and we will use all reasonable endeavours to take action within our direct operations and our wider sphere of influence to ensure slavery and human trafficking are not taking place. We are committed to continuing research, teaching, and raising awareness of modern slavery issues.

## 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





## OUR ETHICS AND VALUES

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

- Honesty
- Boldness
- Trust
- Freedom
- Fun
- Modesty
- Team Spirit

These values are not just words on paper; they are the foundation upon which we build our daily interactions and long-term strategies. Honesty guides us to be transparent and truthful in all our dealings, fostering an environment of trust and integrity. Boldness encourages us to take risks and innovate, pushing the boundaries of what is possible and striving for excellence. Trust is the glue that binds our team together, ensuring that we can rely on one another and work collaboratively towards our goals.

Freedom allows us to think creatively and independently, empowering each team member to contribute their unique perspectives and solutions. Fun reminds us that joy and passion are essential components of our work, keeping our spirits high and our creativity flowing. Modesty keeps us grounded, ensuring that we remain humble and open to learning from our experiences and from each other.

Lastly, team spirit is the cornerstone of our collaborative culture, promoting unity and cooperation in pursuit of our collective success. Together, these values create a vibrant, dynamic, and resilient corporate environment where every individual feels valued and motivated to contribute their best.

## DUE DILIGENCE

Supply chain and procurement processes have been improved with weekly procurement meetings to identify spending and areas of risk.

**Recruitment** in the UK is overseen by the central HR team, involving application forms, face-to-face interviews, security checks, and verification of the right to work. New hires go through an onboarding program using the HR system, Cezanne.

We use our resources to monitor performance and influence best practices and these actions, combined with checking the Modern Slavery Statements of our larger branded suppliers, enable us to make more informed choices of suppliers and facilitate a level of risk assessment.







## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

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

- No reports have been received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- We have appointed an independent third party to conduct an externally facilitated review to gain insights on ways we can tackle slavery and human trafficking.

# BACKGROUND CHECKS

All staff are subject to formal background checks before hiring. We are also members of the Inter-Agency Global Misconduct Scheme.

We have comprehensive and regularly updated Standard Operating Procedures (SOPs) to support our work, including for our

- Lighthouse programme
- Community prevention programme
- Family reintegration
- Foster care
- Outreach policy
- Rescue hubs global policy
- Advocacy procedures
- Our SOPs include risk assessments, as we are working with vulnerable individuals.





# RISK MANAGEMENT



## IDENTIFYING RISK

The highest risk of modern slavery occurring in our operations is:

- Within our rescue and aftercare programmes (which is what the programmes are intended to find and remedy).
- Waste management provision for offices, hubs and residential units (and cleaning services)
- In lower tiers of suppliers of goods and services

To date, we have not identified any actual or suspected cases of modern slavery in our operations or supply chain.

In the event of any incident or suspected incident, we have a detailed, numbered Incident Report system, which includes corrective actions and an impact assessment as well as preventative actions to ensure learnings are captured. All incident reports are reported to our higher authorities.

## **APPROACH TO MERGERS/PARTNERSHIPS**

DBaaS Ltd is aware of its specific roles in the field of modern slavery and therefore approaches any mergers or partnerships mindful of the obligations that this carries. We have identified mergers and partnerships as a risk area through which issues of worker exploitation could be absorbed into Hope for Justice. We collaborate with reputable and recognised NGOs who have appropriate governance. We undertake our thorough due diligence before undertaking new partnerships or mergers. We have rejected two opportunities for mergers in the past 12 months resulting from our due diligence processes.







## MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

DBaaS have a robust process to ensure the risks of Modern Slavery in our Supply Chain are evaluated on an ongoing basis. Moreover, our Supplier Code of Conduct, our empanelment process and our contracting framework with our vendor partners have processes to evaluate any risks of Modern Slavery in our Supply Chain. Modern Slavery is a complex challenge which requires ongoing, evolving and continually improving efforts. We will continue to review our internal processes to ensure that our obligations under the Modern Slavery legislation are met. We use the following key performance indicators to help us sustain our efforts and measure the effectiveness of the steps undertaken to remove modern slavery and human trafficking from our supply chains:

- Working with our suppliers to acknowledge and socialize the Supplier Code of Conduct
- Providing information to support staff on our campuses in India on their rights, including relating to sexual harassment.
- Periodic audits by our internal audit team along with remedial action. Reviewing issues raised through our grievance redressal mechanisms and initiating corrective action.

We will continue to identify ways to improve employee and supplier awareness of DBaaS' commitment to respect human rights and efforts to prevent modern slavery and human trafficking. The policies, practices and procedures regarding responsible business, ethics and compliance apply to all the entities, collectively referred to as 'DBaaS'. We have a process for ongoing consultation and regular training with all our entities and stakeholders.



# TRAINING AND CAPACITY BUILDING

To ensure a comprehensive understanding of the risks associated with modern slavery and human trafficking within our supply chains and business operations, we have implemented (or plan to implement) training programs for our staff. Additionally, we mandate (or will require) that our business partners provide similar training to their employees, contractors, suppliers, and providers. Our training initiatives, whether conducted internally, through subcontractors, or in collaboration with suppliers, are designed to enhance awareness and response to the identified risks of slavery and human trafficking. The training sessions cover:

- Risk Assessment: How to assess the risk of slavery and human trafficking within supply chains and business operations.
- Identification: How to recognize the signs of slavery and human trafficking.
- Initial Response: What immediate actions to take if slavery or human trafficking is suspected.
- Escalation Protocol: How to escalate potential issues related to slavery or human trafficking.
- Supplier Compliance: Steps the organization should take if suppliers or contractors fail to implement anti-slavery policies in high-risk scenarios.



# COMPLIANCE

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# FURTHER STEPS

DBaaS Ltd is committed to continuous improvement to better identify and manage modern slavery risks. Priorities for the years ahead include to:

- Strengthen how we assess our existing suppliers' exposure to and management of modern slavery risks to inform where further due diligence and improvements are required
- Develop alternative solutions to conduct additional due diligence on SMEs identified as a higher risk of modern slavery
- Increase our visibility of suppliers in high-risk supply chains, in particular in the IT manufacturing sector, as well as the risks workers face and how effectively suppliers are managing them
- Improve processes to manage and monitor supplier performance on sustainability and modern slavery- to support continuous improvement



**SIGNATURE / POSITION: FOUNDER & DIRECTOR.**  
**DBAAS LTD**  
**DATE: 08/08/2024**

