Modern Slavery Policy

Developed in accordance with GDPR requirements.

Date	Page Number	Revision Number	Version Number
15/01/2024	All	Document inception to include new format	1.0
04/09/2024	All	Document reviewed and reformatted	2.0

1. Introduction

Fitzrovia IT is committed to maintaining the highest standards of ethical conduct and integrity in our business practices. We recognise the responsibility we have to ensure that modern slavery and human trafficking do not take place within our business or supply chains. This policy outlines our approach to preventing modern slavery and sets out the steps we are taking to ensure that slavery and human trafficking are not present in our operations.

2. Scope

This policy applies to all employees, contractors, suppliers, and partners of Fitzrovia IT. We expect all individuals and organisations within our supply chain to comply with the principles outlined in this policy.

3. Responsibilities

To effectively combat modern slavery, responsibilities are allocated across various levels within Fitzrovia IT:

- **Board of Directors** - The Board is ultimately responsible for ensuring Fitzrovia IT complies with legal and ethical obligations regarding modern slavery. They review and approve the modern slavery policy and allocate resources for its implementation.
- **Senior Management** - Senior management handles the daily implementation of this policy, regularly assessing business operations and supply chains for modern slavery risks and reporting concerns to the Board.
- **Operations & People Manager (Caroline Rhodes)** - Caroline Rhodes oversees recruitment processes to prevent modern slavery and is the contact point for related concerns.
- **Procurement and Supply Chain Teams** - These teams ensure suppliers comply with Fitzrovia IT's Supplier Code of Conduct, conducting due diligence and regular audits.
- **Employees** - All employees must remain vigilant and report any suspicions of modern slavery to Caroline Rhodes at caroliner@fitzroviait.com.

4. Definition of Modern Slavery

Modern slavery encompasses slavery, servitude, forced and compulsory labour, and human trafficking. These are serious violations of human rights and dignity, and Fitzrovia IT is committed to ensuring that such practices have no place in our business or supply chain.

5. Our Commitment

- **Zero Tolerance** - Fitzrovia IT has a zero-tolerance approach to modern slavery. We are committed to acting with integrity and transparency in all our business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery.
- **Legal Compliance** - We are committed to complying with the UK Modern Slavery Act 2015 and all other relevant legislation. We will take all necessary steps to ensure our business and supply chains are free from slavery and human trafficking.
- **Risk Assessment** - Fitzrovia IT regularly assesses the risks of modern slavery within our operations and supply chains. We take appropriate action to mitigate these risks, including auditing suppliers and enforcing strict compliance with our Supplier Code of Conduct.

6. Due Diligence Processes

To prevent modern slavery in our business and supply chains, Fitzrovia IT has implemented the following due diligence processes:

- **Supplier Audits** - We conduct regular audits of our suppliers to ensure they comply with our standards and do not engage in modern slavery practices.
- **Supplier Code of Conduct** - All suppliers are required to adhere to Fitzrovia IT's Supplier Code of Conduct, which explicitly prohibits the use of forced, compulsory, or trafficked labour.
- **Recruitment Practices** - We use rigorous recruitment processes, including verifying the legal right to work of all employees, to ensure no part of our workforce is subjected to modern slavery.

7. Training and Awareness

Fitzrovia IT is committed to educating and training our staff on the risks of modern slavery and how to identify and report any concerns. Training is mandatory for all employees involved in procurement and supply chain management to ensure they understand their role in combating modern slavery.

8. Reporting Concerns

Fitzrovia IT encourages all employees, suppliers, and partners to report any concerns related to modern slavery or human trafficking. Concerns can be reported confidentially to Caroline Rhodes, Fitzrovia IT's Operations & People Manager, via email at caroliner@fitzroviait.com. We are committed to investigating all reports promptly and thoroughly.

9. Continuous Improvement

Fitzrovia IT is dedicated to continuously improving our practices to combat modern slavery. We regularly review our policies and procedures to ensure they are effective and up-to-date. We also strive to engage with stakeholders to enhance our efforts in preventing modern slavery.

10. Approval and Review

This policy has been approved by the Operations & People Manager, Caroline Rhodes, and will be reviewed annually or whenever necessary to reflect changes in legislation, business operations, or supply chain dynamics.

Date of Approval: 04/09/2024

Approved by: Caroline Rhodes, Operations & People Manager