

Modern Slavery and Human Trafficking Statement



Introduction

Zircon and BeTalent (collectively referred to as 'ZBeT', 'we', 'us', 'our') considers modern slavery and human trafficking extremely serious crimes, grave violations of human rights and contrary to the ethical standards and values we hold dear. We are committed to preventing modern slavery and human trafficking in every part of our business and supply chain.

The Modern Slavery Act 2015 (the 'Act') was introduced to help eradicate slavery, forced labour and human trafficking in the operations and supply chains of companies. In accordance with the Act, ZBeT is required to prepare a slavery and human trafficking statement for each financial year. The statement sets out all potential modern slavery risks related to its business and the steps it has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its own business.

This statement is made pursuant to Section 54 of the Act and includes information about the ZBeT, our operations and supply chains, and how we are approaching the eradication of slavery and human trafficking within our business.

ZBeT, as part of its wider objectives, fights for the protection and advancement of human rights in the UK, and around the world. We have a zero-tolerance approach to such abuses. We are committed to preventing modern slavery in our organisation and ensuring that our supply chain is as equally free of both modern slavery and human trafficking (within the reasonable bounds of our influence and control to ensure compliance with the Act by our supply chain and / or assure ourselves of their compliance).

About ZBeT

Zircon and BeTalent work together to provide expert consultancy and innovative technology solutions under one roof. We are an experienced team of HR Consultants and Psychologists who come together to work with our clients to solve their talent requirements.

We support individuals, teams and organisations to reach their highest potential and build a competitive advantage. As a result of listening to what our clients need, we have built a platform and suite of talent products designed to identify, assess, develop and channel people's strengths and understand the ways in which they have potential. Our assessment tools, methods and approaches are developed to provide support and insight at all levels of an organisation, while offering particular expertise in supporting the senior management and executive levels.

Our digital first approach to talent is based on years of research within organisations, alongside a foundation of psychological theory and thought leadership in the talent arena. We partner with our clients to build, design and deliver regional, international and global projects in the areas of Talent

Assessment, Succession, Learning & Development, Leadership and Organisational Strategy, Training, Executive Coaching and much more.

We are a true partnership business; we invest to make talent interventions successful for our clients. We co-create and work with our partners to identify the right solution, and the innovation needed for future, long term success. We continually research, design and innovate to bring new, best in class products to help solve people and business challenges. We transfer our knowledge and upskill our client's talent and HR teams creating sustainable solutions that don't cost the earth.

We directly employ more than 15 staff across the UK, as a combination of office-based staff and home-workers. We are confident that their employment status is not generally vulnerable to modern slavery, and our own operations are free of modern slavery, forced labour and human trafficking. Colleagues across ZBeT work under comparable terms and conditions that are in accordance with UK employment law.

We have a Board of Directors, who are committed to maintaining a high standard of corporate governance.

Our commitment

ZBeT is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not engage in business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our supply chain

ZBeT is committed to improving our practices to identify and eliminate modern slavery and human trafficking in our supply chains, and to act ethically and with integrity in all our business relationships. Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains. Our supply chains are limited, and we procure goods and services from a restricted range of suppliers.

The suppliers we use to deliver our activities, and our own operations, are primarily UK based. We contract with a range of local suppliers, from reputable IT companies to respectable legal and

accountancy service providers, as well as individual consultants who work within our specialised field of expertise. Our risk analysis of our supply chain allows us a better understanding of supply contracts where there is a greater risk of exploitation.

We also create, negotiate and have access to a series of Service Level Agreements (SLA), and frameworks - umbrella agreements put in place with a group of suppliers and contractors who fit certain criteria. These frameworks are available to our members, who rely on us to have completed modern slavery compliance checks on suppliers. We are continuously evaluating how we can improve our oversight of these suppliers.

Our policies in relation to the Modern Slavery Act 2015

ZBeT endeavours to raise awareness among all employees of the identification, prevention and eradication of modern slavery and human trafficking, and has policies and procedures in place to ensure that they can do so. We have a range of employment policies in place which ensure that our employees are fairly treated, supported, remunerated and understand the behaviour expected by the organisation.

The following policies/manuals are accessible to all staff:

Anti-Slavery & Anti-Trafficking Policy

We require all our staff, contractors, suppliers, partners and affiliates to comply with this policy. The policy's objectives are:

- Not to directly support any organisation, initiative or activity that causes, promotes or contributes to modern slavery or human trafficking.
- Not to engage, contract or work with any entity or organisation that causes, promotes or contributes to modern slavery or human trafficking.
- To ensure any victims have access to remediation and justice.
- To maintain risk-assessed and transparent supply chains.
- To publish and maintain the ZBeT Statement on compliance with the requirements of Modern Slavery Act 2015.
- To remain aligned and co-operate with activities of the UK Anti-Slavery Commissioner.

Anti-Bribery Policy

The key objectives of this policy are to:

- Take a zero-tolerance approach to bribery and corruption.
- Act professionally, fairly and with integrity in all our business dealings and relationships.
- Implementing and enforcing effective systems to counter bribery.
- Maintaining our brand image by keeping to the highest possible standards of business practice.

Code of Conduct

We expect all our staff, contractors, suppliers, partners and affiliates to:

- Behave, at all times, in a manner consistent with our values.
- Be open and talk about any difficult or ambiguous situations/problem and be encouraged to make the right decisions.
- Adhere to a common standard of doing things.
- Always follow and uphold the law.
- Act with integrity and honesty towards our clients, colleagues and communities within which we work.
- Aim for excellence and deliver to the highest possible standards.

Equality and Diversity Policy

The crux of our Equality and Diversity policy is:

- Our aim to be an inclusive organisation, committed to providing equal opportunities throughout employment including in the recruitment, training and development of employees, and to pro-actively tackling and eliminating discrimination.
- Promoting a culture that actively values difference and recognises that people from diverse backgrounds and experiences can bring valuable insights to the workplace and enhance the way we work.
- Embracing a core humanitarian, ethical and legal responsibility to champion equality, diversity, and inclusion.

Supplier Relationship Management Policy

We focus on the following main objectives when formulating and implementing our Supplier Relationship Management Policy:

- Managing supply risk and compliance with responsible sourcing and keeping mind ethical and regulatory requirements.
- Consistently monitoring performance of strategic suppliers with a view to supporting ZBeT's core business and ethical standards.
- Fostering business development and innovation by identifying opportunities and having a joint sense of purpose.

Going forward

We will continue to monitor our ongoing commitment to our obligations under the Modern Slavery Act 2015. We will do so by:

- Providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Ensuring staff involved in procurement activity are aware of and follow modern slavery procurement guidance.
- Ensuring that consideration of the modern slavery risks and prevention are added to ZBeT's

policy review process as an employer and procurer of goods and services.

- Making sure ZBeT procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- Continuing to take action to embed a zero-tolerance policy towards modern slavery.
- Addressing whether there are modern slavery risks during the contract strategy stage.
- Continuing with compliance checks as part of the new supplier registration process. This may require suppliers to provide evidence of compliance with relevant legislative, safety, health, environment and quality principles and procedures, where appropriate, before being eligible to provide goods/services to ZBeT.
- Undertaking retrospective checks on key existing suppliers to ensure they comply with the requirements of the new supplier process. Where these suppliers fail to do so then engagement shall be required to promote compliance on their part.
- Working as part of our corporate social responsibility to complete a risk analysis of our supply chain and create an action plan to improve transparency and accountability.
- Identifying key performance measures regarding the mitigation of modern slavery in our supply chain.
- Sharing our Anti-Slavery and Anti-Trafficking Policy with suppliers, if required, and request that it is cascaded to their employees.
- Reviewing and updating Modern Slavery references in our contracts
- Continuing to raise awareness of the Act within ZBeT via our collaborative meetings.

This statement is made pursuant to Part 6, section 54 of the Act and constitutes ZBeT's anti-slavery and human trafficking statement for the financial year ending 31 March 2023 and has been approved by the ZBeT Board of Directors.

This statement will be reviewed and updated every year.

Sarah Linton
Chief Operations Officer, ZBeT

10 August 2022