

# Modern Slavery Statement

## 2020/21

The Nycomm Group is committed to ensuring that it is free from acts of modern slavery from within its own business and within its supply chain. The Company acknowledges responsibility for implementing the requirements of the Modern Slavery Act 2015 and will ensure transparency within the business and with suppliers of goods and services to the organisation.

Nycomm takes a long-term view of what is right and will remain committed to the continuous improvement of delivering high standards to meet the expectations of our customers, stakeholders and to protect the human rights of those engaged within, and supplying to, our business.

We expect the same high standards from those we work with and are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or any part of our business.

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### **Our Business**

The Nycomm Communications Group is the largest independent telecommunications and technology supply specialist in the UK – with a turnover of £130m and over 370 dedicated staff.

Established in 1981 we work with big name brands such as Samsung, Panasonic, BT and Microsoft as well as major retailers including Amazon, Boots, Mothercare and Aldi.

The technology we supply and support helps major blue chip companies and smaller enterprises perform smarter and more efficiently. From sophisticated Unified Communications systems and video conferencing to headsets, telephones and network routers. We also provide network connectivity solutions and mobile services whilst our retail operation features specialist technologies in the nursery sector as well as audio visual, health and well-being, in-car tech, two-way radios – plus more.

### **The year 2019 saw the creation of Avoira.**

Avoira is the fusion of four business entities: Pennine, Videonations, Co-Channel, and Rocom. They are all long-established, renowned, and trusted specialist providers from the communications industry – merging together to supply fluent technology solutions to UK businesses.

### **Our Supply Chain**

The supply of products is managed through the Group Procurement team. We buy a wide range of goods, the majority being sourced from reputable suppliers in the UK and the EU. We also have suppliers from China, Hong Kong, Israel, South Korea, South Africa, Taiwan and the United States.

### **Our policies**

Our companies and employees operate under a number of policies to ensure high standards of social, governance and ethical compliance. All policies are available internally on

Nycomm's intranet with key policies placed on the website.

Our **Code of Conduct** sets out how we are committed to acting ethically and with integrity in our business operations and towards our employees. We also expect our suppliers to understand, take responsibility and ownership for implementing their own Code of Conduct standards throughout their own supply chains and business operations.

**Equality & Diversity policy/Anti- Bullying policy** - We have zero tolerance for any threat of physical or sexual violence, harassment or intimidation against employees. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally and are paid at least the national minimum wage. Our employees will not be forced to work in excess of the number of hours permitted in law.

**Recruitment Policies** – On the rare occasion we use agency staff, we use only specified, reputable employment agencies that operate nationally under the REC to source agency workers. All employees are checked for their right to work in the UK status.

**Whistleblowing Policy** - We encourage all our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the Nycomm Group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of reprisal

### **Training**

We provide adequate information and training to all our employees, examples include:

- Induction for all new joiners including information on our policies and processes;
- Leadership training for our Managers;
- Employees and Managers are supported by our HR Team .

**We regularly review all our policies and identify areas for improvement.**

### **Due Diligence**

#### **Supplier Selection**

Quality, ethics & compliance are a part of our supplier selection.

The Group have embedded Modern Slavery due diligence into the supplier set up process, and all new suppliers are checked for compliance, with any issues being explored before onboarding.

The Initial selection is carried out by way of a supplier onboarding questionnaire. This covers financial stability, human rights, quality, environmental impact, working standards, modern slavery, anti-corruption and IT security. New suppliers must self-declare and sign that they have as a minimum policies in place to cover the above areas. A risk analysis is then carried out to determine whether it is suitable to work with the company.

We aim to look for diverse range of suppliers that are ethical and stable to do business with. This is centrally managed by our legal and compliance team. When we select who we decide to work with we make sure our Terms are clear and transparent and support the group values and our corporate social responsibility objectives. In effect, we build relationships with companies that support and adopt similar principles to ourselves.

## **Contracts**

We flow our code of conduct ethos through all aspects of supplier sourcing and management including our supplier contracts, purchasing processes and auditing.

Our procurement contracts for existing and new suppliers cover ethics, anti-slavery, good ethical trading standards, safety and human rights. We also reserve the right to request compliance information and to audit if decided by the Legal & Compliance team.

## **Our staff**

We see our people as our most valuable asset and as such we foster an environment where employee well-being is a priority. We encourage an open workplace where staff feel comfortable reporting any issues or concerns about any conduct they believe to be, unlawful, fraudulent or unethical, with guaranteed anonymity if requested.

## **SEDEX membership**

We are a member of the world's largest collaborative platform for sharing responsible sourcing data on supply chains. We can share and view information on registered supplier's greater visibility of any risks working to improve working conditions in global supply chains.

## **Future Plans**

This year we will continue to identify, assess and manage risks.

During any procurement process we will continue to gather info from suppliers about their awareness and compliance with the Act.

We will continue to ensure appropriate contractual provisions are written into supplier contracts

The Legal and Compliance team will create an updated Ethical procurement policy &

Supplier code of conduct these will be disseminated to all of our suppliers and be sent during the onboarding process.

This statement has been approved by the organisation's board of directors, who will review and update it annually



Signed – Andrew J Roberts

Director  
Nycomm Ltd