

## **The Nycomm Group**

### ***Modern Slavery Statement 2021***

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 Group is a value-added specialist distribution and technology supply specialist in the UK with a turnover of £135m 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 principal activity of group is the supply, support and distribution of unified communications and electronic equipment.

2020 has been another positive year for the group as we continue to pursue our established strategy. The group's strategy is to achieve long term sustained and profitable growth and an environment for our teams to develop and grow their careers at Nycomm. The group's high value add specialist distribution, supply and support model remains fundamentally valid, combined with the strong technical skills and product breadth means that the business is well placed for future growth. We have a large and diverse customer base and longstanding relationships with a number of vendors, some of which date back to the company's origins in 1985.

#### **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 and 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 of 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

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

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## 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. All new suppliers are checked for compliance with any issues being explored before onboarding. This begins with a country level risk appraisal to determine the scope of our human rights and due diligence assessment. We work collaboratively with potential suppliers identifying at the early stages those procured goods which may carry a higher risk of modern slavery and ensuring due diligence checks are carried out.



As part of the group's due diligence process into slavery and human trafficking, the supplier approval process will require all suppliers to confirm that they are compliant with the requirements of the Act. The company and group will not support or deal with any business knowingly involved in slavery or human trafficking.

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. 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.

The company and group reserves the right to conduct audits of key suppliers to ensure compliance with the Nycomm Group Supplier Code of Conduct. These audits can be done either by Nycomm employees or by contracted, independent third parties or a combination. We expect our suppliers to respect human rights, including maintaining policies and procedures to prevent the use of child or forced labour..

## **Our staff**

We see our people as our most valuable asset and as such we foster an environment where employee wellbeing is a priority. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chain.

The company directors and senior management will take responsibility for enhancing this policy statement and its objectives, and shall provide adequate training to ensure that, wherever possible, slavery and human trafficking is not taking place within the organisation or within its supply chains.

## **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 suppliers with greater visibility of any risks.

## Future Plans

Our plans for the future continue to be the investment in our teams, to strengthen our portfolio of products and services offered and to continue to invest in strategic acquisitions where the directors consider are appropriate. This year we will continue to identify, assess and manage risks.

During the procurement process we will continue to gather information from suppliers about their awareness and compliance with the Modern Slavery Act.

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

The legal and compliance team will finalise and publish an ethical procurement policy and supplier code of conduct. These will be disseminated to all of our suppliers and be sent during the onboarding process.

Training on this policy and on the risk that our business faces from modern slavery in its supply chains will be provided. We will adopt a 'vigilance plan' approach within our procurement team which equips them with the awareness of potential high-risk areas, for example Xinjiang, China.

Our zero-tolerance approach to modern slavery in our business and supply chains will continue to be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We will publicly report on our progress against these objectives in next year's statement.

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

Signed



Director  
Nycomm Ltd