



**Cyberfort**

**Cyberfort Group Limited**  
Modern Slavery Policy & Statement

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# 1. Introduction

## 1.1 Objective

Cyberfort Group Limited (CGL) is committed to preventing and eradicating modern slavery and human trafficking in all its forms within our operations and supply chain. Our objective is to uphold the highest standards of ethical conduct and human rights, ensuring that all individuals associated with our business are treated with dignity, respect, and fairness.

Specifically, our modern slavery policy guiding principles aims to:

- **Raise Awareness:** Raise awareness among employees, suppliers, contractors, and stakeholders about the risks of modern slavery and human trafficking, as well as their role in preventing and addressing these issues.
- **Implement Due Diligence:** Implement robust due diligence processes to assess and mitigate the risk of modern slavery and human trafficking within our supply chain, including conducting risk assessments, supplier audits, and evaluations of labour practices.
- **Establish Policies and Procedures:** Develop and implement clear policies, procedures, and guidelines that prohibit modern slavery and human trafficking in all aspects of our business operations. These policies should encompass recruitment and employment practices, supplier relationships, and the procurement of goods and services.
- **Provide Training and Support:** Provide comprehensive training and support to employees, suppliers, and contractors to ensure they understand their responsibilities under the modern slavery policy and are equipped with the knowledge and tools to identify, report, and address potential instances of modern slavery and human trafficking.
- **Monitor and Evaluate Performance:** Establish mechanisms for monitoring and evaluating the effectiveness of our modern slavery policy, including regular reviews of compliance, performance metrics, and feedback from stakeholders. Continuously improve our policies and practices based on lessons learned and best practices.
- **Foster Collaboration and Engagement:** Collaborate with industry peers, government agencies, non-governmental organisations (NGOs), and other stakeholders to share information, resources, and best practices for combating modern slavery and human trafficking collectively. Engage with suppliers and partners to promote ethical labour practices and drive positive change throughout the supply chain.
- **Demonstrate Transparency and Accountability:** Maintain transparency and accountability in our efforts to combat modern slavery and human trafficking by regularly communicating with stakeholders, disclosing relevant information about our policies and practices, and publicly reporting on our progress and achievements.

By pursuing these objectives, CGL seeks to fulfil its moral and legal obligations to combat modern slavery and human trafficking, uphold human rights, and contribute to a more just and sustainable global community.

## 1.2 Scope

### 1.2.1 Applicability to Employees

CGL refers to Cyberfort Group Limited as well as its majority-owned subsidiaries and joint ventures (if applicable). This Policy applies to all employees, officers, members of Board of Directors, and all consultants, and contractors.

### 1.2.2 Applicability to External Parties

Relevant Policy statements will apply to any external party and be included in contractual obligations on a case-by-case basis.

### 1.2.3 Applicability to Assets

This Policy applies to all information assets globally owned by CGL, or where CGL has custodial responsibilities.

## 2. Modern Slavery Policy and Statement

While The Cyberfort Group is not required under S.54 of the Modern Slavery Act 2015 to have an Anti-Slavery Policy, we feel passionately that we must act ethically and transparently in every situation and consequently have set out the steps that we have taken, and are continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We have a zero-tolerance approach to any form of modern slavery.

### 2.1 Our Business

The group offers a matrix of global cyber advisory, detection and defensive security solutions. We focus on the provisions of ultra-secure, ultra-available Cybersecurity services, including cyber security consultancy, penetration testing and vulnerability scanning, cloud, managed hosted and datacentre solutions. CGL employee circa 140 people across the organisations. We have employees at entry level within the organisation who are involved with purchasing and our structure can be found in our ISMS.

### 2.2 Our High-Risk Areas

CGL have assessed the risks of our products and services as well as our supply chain and do not believe we have any high-risk areas relating to modern slavery or people trafficking, all are permanent and temporary staff members and contractors are professional people who have been recruited through open channels and thoroughly vetted and our suppliers are similar, professional, organisations. The organisations we use.

### 2.3 Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. [Modern slavery policy and statement](#) - This policy sets out our guiding principles and approach to modern slavery.
2. [Supplier Management Policy](#). CGL recognise to meet our Modern slavery guiding principles the management of our supply chain is essential to achieving our goals. This policy governs how we assess our suppliers and our commitments in ensuring we are performing a adequate level of due diligence.

## Modern Slavery Policy & Statement

3. [Bribery and Corruption Policy](#): CGL prohibits bribery, corruption, extortion, and other unethical practices in all of our business dealings, whether involving government officials, customers, suppliers, or other parties. We comply with all applicable anti-bribery and corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.
4. [Whistle-blower policy](#) - We Will also protect any individual who makes us aware of an infraction of any company policy.
5. [Equality, Diversity & Inclusion Policy](#)- The purpose of this policy is: to promote equal treatment of all employees or potential employees. To prevent, reduce and stop all forms of unlawful discrimination and to ensure that all recruitment, promotions, transfers, training, development assessment, benefits, pay, terms and conditions of employment, redundancy and dismissals are determined on the basis of capability, qualifications, experience, skills and productivity rather than unlawful criteria. (This can be found in The Cyberfort Group People Handbook)

### 2.4 Our Suppliers

The Cyberfort Group works with myriad of suppliers, big and small, where we can we will gain a copy/link of their modern slavery policy but often they are not big enough to have one. where we can, especially if we have concerns, we conduct due diligence on all suppliers before allowing them to become a supplier. This due diligence may include requesting a copy of the policy, or conducting an online search of <https://business-humanrights.org/en/uk-modern-slavery-act> to ensure that particular organisation has never been convicted of offences relating to modern slavery.

We ensure all suppliers complete the due diligence form, which request a copy of every supplier's modern slavery policy and if they do not have one, further questions are asked at this point to ensure compliance. We are also able to check <http://modernslaveryregistry.org/> if we want to investigate any further.

We have a confidential online anonymous form (access available through SharePoint) that any employee can access to identify any companies or practices that give cause for concern.

### 2.5 Training

We conduct online training for all employees involved in procurement/buying so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. This is part of on boarding for new starters and an annual audit is conducted to ensure current employees have completed the appropriate training.

### 2.6 Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- no reports are received from employees, the public, or law-enforcement agencies to indicate that modern slavery practices have been identified.
- We will annually review our policy and procedures to ensure they continue to be effective. The outcome of this report will be given to the board to review.



Nige Wilkinson  
(Chief Operating Officer)  
Reviewed 06/03/2024

### 3. Compliance Measures and Enforcement

Compliance with this policy is measured and monitored by system and document owners as well as our compliance team. Cyberfort has established an audit programme that assesses the effectiveness of this policy and whether CFG are meeting their legal, statutory, or regulatory obligations. A master document tracker is in place to ensure regular reviews of the policy are being carried out.

Validation and verification of evidence during compliance audits can be presented in hard copy or electronic format.

#### 3.1.1 Enforcement

As noted above, this policy applies to all CGL employees, officers, members of the board of directors, and all consultants and contractors. Violations of this policy may result in disciplinary action, up to and including termination of employment and, or legal action.