



# JIGSAW24

## Modern Slavery and Human Trafficking Statement

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## Policy Statement

Jigsaw24 is committed to the highest level of ethical standards and integrity in its approach to driving out acts of modern day slavery and human trafficking within our business and from within our supply chains, including sub-contractors, and our partners. We acknowledge our responsibility under the Modern Slavery Act 2015 and will ensure transparency within our Company and our suppliers of goods and services to the Company.

Modern day slavery is a criminal offence and a violation of basic human rights. It can include forced and compulsory behaviour, slavery and human trafficking, all of which lead to the deprivation of an individual's liberty by another, in order to exploit them for commercial or personal gain.

This policy statement sets out Jigsaw24's actions in understanding all potential Modern Slavery risks related to the business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in our own business or supply chains. Our Company takes a zero tolerance attitude toward modern slavery.

Jigsaw24 will not support or deal with any business knowingly involved in slavery or human trafficking. Our Company Directors and Board will take responsibility for implementing this policy and its objectives. Furthermore, adequate resources and investment will be provided to ensure that slavery and human trafficking is not taking place within the organisation and its supply chain.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our integrated Management System, compliant with the requirements of ISO 9001, ISO 14001, ISO 20000-1, ISO 27001 and ISO 50001. The implementation and operation of this management system underlines our commitment to the modern slavery policy.

## Our Organisation

Jigsaw Systems Limited t/a Jigsaw24 is a legal entity incorporated and registered in England and Wales with company number 02745074 whose registered offices are at 40 High Church Street, Nottingham NG7 7JA.

Jigsaw24's solutions have been powering more than 20,000 companies for over 30 years. We work with many of the UK's biggest creative and corporate companies, as well as major education and public sector organisations. We've developed a proud company culture rooted in delivering great customer service and treating people with the respect they deserve.

Partnering with top manufacturers (Apple, Adobe, Avid, HP, Microsoft and more) means we offer platform-agnostic solutions and can support any environment.

We are anticipating an annual turnover of £164 million for our financial year ending 31st May 2022.

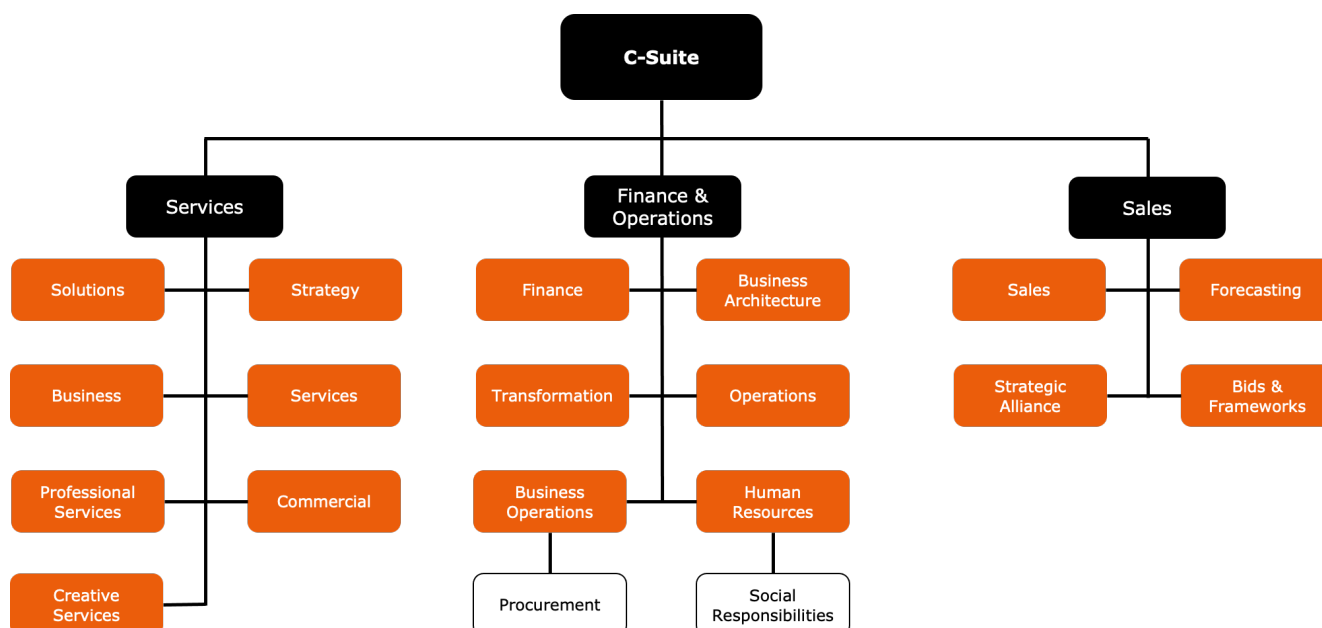
Our target market has 5 main groups and across these groups we provide a full range of end user solutions and productised services.

- Creative industries
- Business2Business
- Education
- IT & Comms
- Public Sector

Most of our suppliers and contractors are based in the UK.

## Our Structure

Our organisation is headed up by the Board which consist of 5 Chief Officers. There are 3 main functions within Jigsaw24: Services, Finance & Operations and Sales.



## Internal Policies & Documentation

Our employees are made aware of our modern slavery policy upon commencement of employment and throughout. They must acknowledge their understanding and compliance with it.

Jigsaw24 operate a number of internal policies, listed below, that describe the approach taken to ensure we are conducting business in an ethical and transparent manner and this applies to all persons working for us or on our behalf.

- Anti-Corruption & Bribery
- Anti-Fraud
- Code of Conduct
- Core Values
- Corporate Social Responsibility
- Recruitment
- Supplier due diligence risk assessments
- Supplier Management
- Terms of Business
- Whistleblowing

## Learning and Development

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chain, we provide staff with annual training on modern slavery awareness which includes what modern slavery is and how to identify types of modern slavery, such as:

- Human trafficking
- Forced labour
- Debt bondage/bonded labour
- Descent-based slavery
- Slavery of children
- Forced or early marriage
- Domestic slavery

Our Procurement team have access to additional training relating to ethical procurement & supply.

Staff are also made aware of how to report a suspected instance of Modern Slavery, including human trafficking, forced labour or debt bondage, to the government's Modern Slavery Helpline or to the Police.

## Recruitment

Jigsaw24 is committed to providing equal opportunities in all aspects of employment and the recruitment process.

Our recruitment process includes background checks on new employees and confirmation of their right to work in the UK.

## Key Performance Indicators (KPI's)

Jigsaw24 has introduced the following KPI's in response to the Modern Slavery Act 2015 which are reviewed annually:

- 100% of our suppliers to agree to abide by the Modern Slavery Act 2015, either through management of their own Modern Slavery Act statement or voluntary declaration
- 100% of suppliers are assessed in line with the Modern Slavery Act 2015 prior to onboarding and all medium to high-risk are risk assessed
- 100% of new staff are made aware of modern slavery during their induction and are invited to complete the modern slavery awareness training within the first month of their employment
- 100% of staff receive modern slavery awareness training annually and invited to complete within one month of enrolment.

## Transparency in Supply Chain (TISC)

### Our Supply Chain

We will only do business with companies that share our commitment to treat all stakeholders fairly and ethically in accordance with the United Nations Global Compact on human rights, labour regulations, protection of the environment and anti-corruption. We make every effort to ensure that both Jigsaw24 and our suppliers abide by all relevant legislation, including:

- The Bribery Act 2010
- United Nations Global Compact
- Modern Slavery Act 2015
- Public Contracts Regulations 2015 Directive 2014/24/EU
- Equality Act 2010
- Public Services (Social Value) Act 2012

Jigsaw24 operates a supply chain management policy to show transparency in its commitment to maintaining an ethical approach to global human rights. Jigsaw24 will only do business with organisations with whom no part of their business operations contradicts our policy.

### Due Diligence and Assessment of Suppliers

The Company undertakes a robust on-boarding process with new suppliers, to include in-depth 'checks' in respect of their Terms and Conditions, Anti-Bribery and Corruption policy, Environmental Policy, CSR (Corporate, Social Responsibility) and Modern Slavery Act 2015 Policies.

The Company maintains a comprehensive risk assessment to ensure compliance with the Modern Slavery Act and has mapped all Tier 1 Suppliers to determine the level of risk within our supply chain.

Our supply chain includes the following sectors:

- Distributors
- IT Resellers
- Manufacturers

### Monitoring our Supply Chain

Our procurement and accounts payable teams are responsible for supply chain management. When working with subcontractors on a project, the Company employs a Project Management team to take responsibility of the subcontractor relationship, in order to provide ourselves and customers with a single point of accountability.

To ensure all those in our supply chain comply with our values and ethics, we have in place a monitoring programme using a three point system of audits, operational performance management meetings and customer feedback. Our ISO9001:2015 quality management system provides us with processes and procedures for reviewing supplier performance, including a rolling audit programme.

In addition to audits we also hold quarterly performance management meetings where each individual subcontractor's performance is measured against set KPIs.

## Dealing with issues within our Supply Chain

Non-performance is identified early at contract reviews, customer meetings or customer escalation routes available throughout the contract. The accounts payable and procurement teams will assess the issue and agree any corrective action that needs to be taken, and the degree to which the subcontractor should be monitored moving forward to avoid a repeat of the issue.

Information about the issue is kept in the Company's files, with any commercial implications being dealt with by the Founder & Director. The subcontractor review process is conducted through a balanced scorecard using a traffic light system. We work through a positive action process whereby we always look to find a positive outcome with a subcontractor and ensure corrective action is taken.

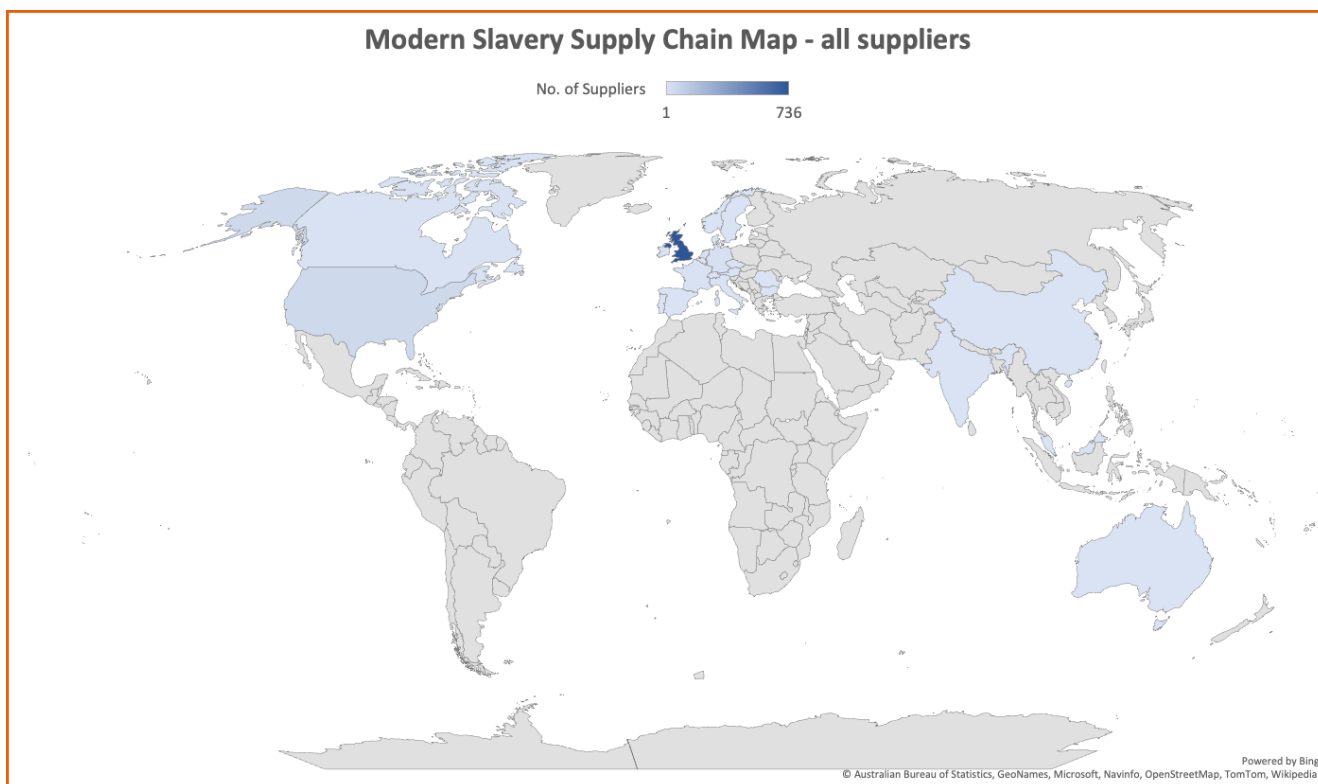
However, where a sub-contractor has consistently underperformed and the available support systems have not proved effective, we will look to terminate our agreement and source a new supplier. In addition to this, when a major non-conformance is identified (for example risk to the person or property), we will conduct a comprehensive investigation which may result in termination.

## Mapping our Supply Chain

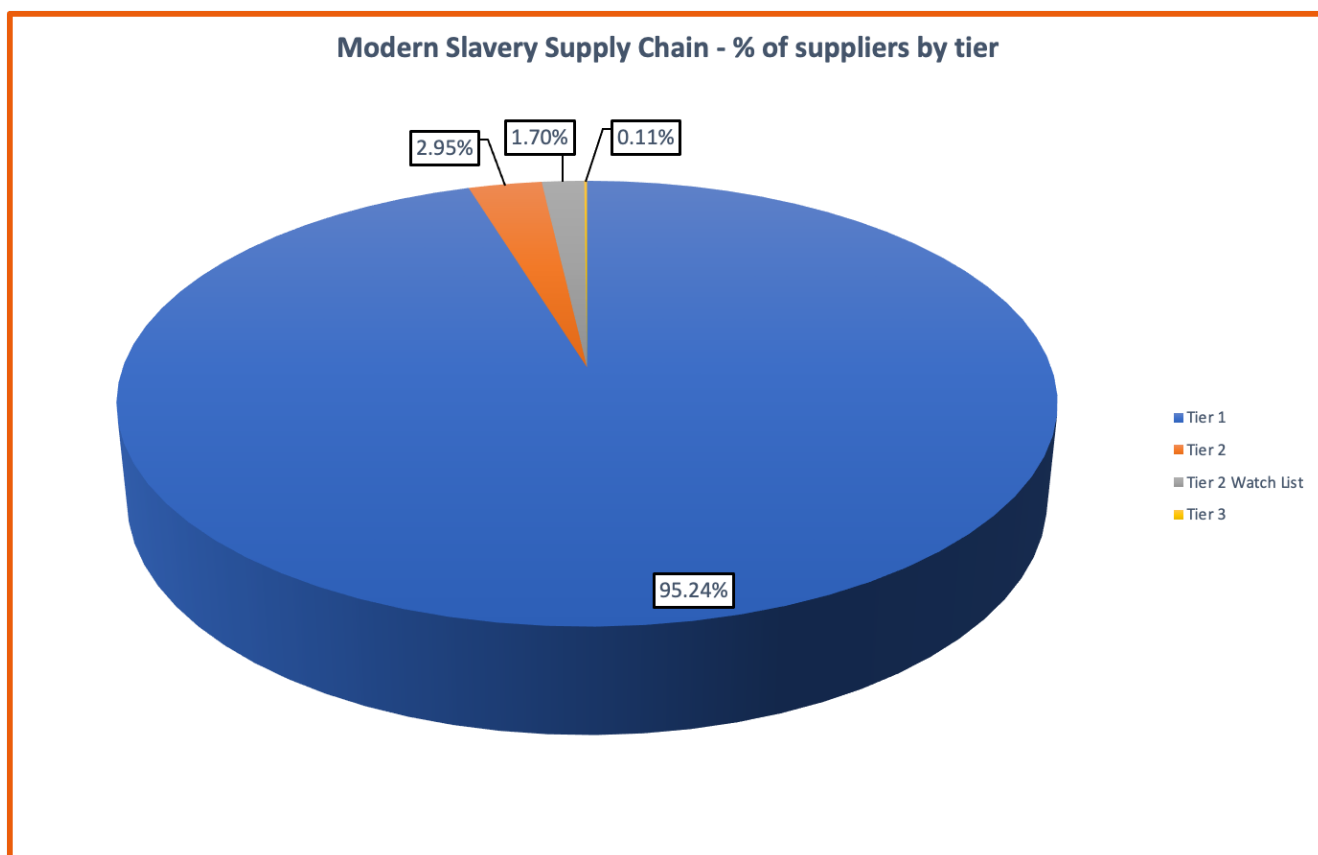
Our suppliers are based in the following countries (correct as of 12<sup>th</sup> May 2022):

Australia	Malaysia
Austria	Malta
Belgium	Netherlands
Bulgaria	Norway
Canada	Portugal
China	Romania
Czech Republic	Singapore
Denmark	Spain
France	Sweden
Germany	Switzerland
India	United Kingdom
Ireland	United States of America
Italy	

Modern Slavery Supply Chain Map - all suppliers



Modern Slavery Supply Chain - % of suppliers by tier





## Corporate Social Responsibility and managing our Human Rights impact

### Our Cultural Statement

Our culture is grounded in delivering great customer service and providing solutions based on technical excellence. We strive for a culture where everyone is passionate about our business, where we maximise our opportunities, deliver value and enjoy success; a culture where people are recognised and appreciated for their contribution.

Underpinning our culture are the values and principles that we cherish. We want to create an environment that cares about the wellbeing of our employees; a workplace that is open and inclusive and where everyone can express themselves, work hard and also enjoy themselves. We want people to be challenged and receive support along the way, so they feel encouraged to stay with Jigsaw24.

Our values are embodied in the *Jigsaw24 Way*: how we “delight the customer” by “working together”, and in doing so create a company customers want to do business with and where employees want to stay and build a career.

We support the United Nation’s Sustainable Development Goals and further details on this, including our Social Impact Report, can be found on our website at

<https://www.jigsaw24.com/about/social-responsibilities>

### Inclusion and Diversity

At Jigsaw24, we believe in promoting equal opportunities within our business. We’re on an unrelenting journey to make big changes to how we approach inclusion and diversity, and we aim to lead by example in the tech sector. Inclusivity is at the heart of our culture.

We want to empower every person at every level of our business to achieve their ambitions. Within that context, ensuring that there are role models throughout our business is really important, because we believe that you can’t be what you can’t see.

When we’re recruiting, we aim to select from a pool of available candidates that includes full representation of women and minority groups. Internally, this means developing employees from underrepresented groups, giving them the maximum chance to grow into more senior roles. Externally, this means working harder to identify potential candidates for roles and working with recruitment agencies to positively target high quality employees from those groups.

We have also partnered with Nottingham Trent University to provide a bursary to establish a £12,000 Higher Education Bursary for a female Computer Science student. The university makes bursaries available to students from lower socio economic backgrounds, and has been offering ours since the September 2021 intake. It provides financial support for one student during their three years of study and one year in industry.

## Health and Wellbeing

Wellbeing, at its simplest level, is perhaps ultimately about personal happiness – feeling good and living safely and healthily. At the very least Jigsaw24 must ensure that work does not undermine our employees' overall wellbeing, and our intention is that we should enhance it, actively contributing towards improving how our employees feel.

During the financial year 2021/2022, we have invested in the mental health first aider programme, training management on mental health awareness and 7 employees as mental health first aiders.

In April 2022, Our employee benefits package was enhanced to include a health care benefit that provides health checks, medical support and cashback across various health ailments and treatments, designed to continuously help improve employee physical and mental health.

## Living Wage

We are also delighted to become an accredited Living Wage Employer and support the principle of a national living wage for our workers and we are clear in our ambition to be seen as an organisation that offers good employment opportunities and rewarding careers. We are committed to ensuring that all directly employed and contracted staff receive a fair wage for the job they perform.

## Charities and Community

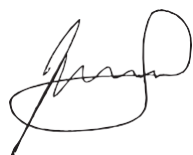
Jigsaw24 has enthusiastically supported many charitable initiatives over the years, aligning to our core values of inclusion, sustainability and wellbeing.

Some of the charities supported during Financial Year 2021/2022 are as follows:

- Oxfam
- Shoebox appeal
- Toilet and Tap Twinning
- Trussell Trust

## Management Approval

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for the financial year ending 31st May 2022.**



John Hughes

**Founder & Director**

Date: 1st June 2022