Cyberfort Group Limited

Modern Slavery Policy and Statement

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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.

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. We are 4 companies, The Bunker, Arcturus, Agenci, and Auriga and employee circa 120 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.

Our High-Risk Areas

We 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

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 document) - This policy sets out our stance on modern slavery.
2. Talent policy - We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. (This can be found in The Cyberfort Group People Handbook)
3. Ethics policy - The purpose of this policy is to establish a culture of openness, trust and integrity in our business practices. We care as much about how results are achieved as we care about the results themselves. (This can be found in The Cyberfort Group People Handbook)
4. Whistle-blower policy - We Will also protect any individual who makes us aware of an infraction of any company policy. (This can be found in The Cyberfort Group People Handbook)
5. Equal opportunities 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

6. 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)

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.

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.

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

Signature of Nige Wilkinson
COO