

# Anti-Slavery Policy

31<sup>st</sup> May 2019

## **ANTI SLAVERY POLICY**

This statement sets out the steps that Dynamic Mobile Billing Limited has undertaken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Dynamic Mobile Billing has a zero-tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings.

We are committed to creating effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain and impose those same high standards on our contractors, suppliers and other business partners.

### **COMPANY STRUCTURE AND SUPPLY CHAINS**

DMB are part of the Oxygen8 Group of Companies, providing mobile and e-commerce solutions to businesses. The Group has a global turnover of approximately £100 Million.

Oxygen8 Group is the parent of Dynamic Mobile Billing Limited, employing over 200 employees globally and with operating offices in the UK, Ireland, Australia, South Africa, Kenya, Uganda, Tanzania and Mozambique.

As such, Oxygen8 Group and its subsidiary businesses (like DMB) has a diverse supply chain and we procure goods and services globally. We work with different suppliers, contractors and subcontractors as well as partners. Some of these relationships are parochial whilst others are multi-national in their nature.

### **OUR POLICIES**

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

- Anti-slavery guidance. Dynamic Mobile Billing stance on modern slavery, it explains how employees can identify any instances of this and where they can go for help.
- Dynamic Mobile Billing recruitment process confirms that eligibility to work in the UK checks are conducted on all employee, including but not limited to checking an original passport, birth certificate or other qualifying documentation.
- Whistleblowing policy. This ensures all employees know they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Code of good business practice. This code explains the manner in which we behave as an organisation and how we expect our employees to act.

## DUE DILIGENCE PROCESSES

As part of our initiative to identify and mitigate risk, we:

- Operate strict procurement processes, requiring suppliers to comply with all applicable laws and standards, including those which relate to the Modern Slavery Act;
- Base our tender documents on the government standard selection questionnaire (SSQ) with specific questions in the ITT response around the Modern Slavery Act and compliance with it;
- Expect our suppliers to have suitable policies and processes in place within their own businesses to prevent child labour, modern slavery and human trafficking and to cascade those policies to their own suppliers;
- Undertake a continuous review of assurance information from existing suppliers and partners and follow up where relevant;
- Have included a specific item relating to the Modern Slavery Act in the agenda of the contract management meetings with suppliers enabling us to be kept informed of and monitor any changes;
- Include appropriate terms in our contractual documentation with suppliers:
  - obliging suppliers and their contractors, suppliers and employees to comply with the Modern Slavery Act;
  - reserving the right for Ordnance Survey to audit suppliers and their contractors, where we consider it appropriate;
  - obliging suppliers to report to us if they are aware of or suspect slavery or human trafficking in a supply chain connected to any Ordnance Survey contracts;
- Reserving the right for us to terminate the contract at any time should any instances of modern slavery come to light.
- The Procurement Team follow the advice and guidance in relation to the Modern Slavery Act set out in the Chartered Institute of Purchasing and Supply (CIPS) code of professional conduct.

The above procedures are designed to:

- Identify and assess potential risk areas in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Monitor potential risk areas in our business and supply chains.

## TRAINING

We regularly conduct modern slavery training for our procurement teams and issue guidance to our employees so that they are aware of the issues surrounding modern slavery and what to do if they suspect that it is taking place within our supply chain.

## 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:

- reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- the use of grievances mechanisms.
- the level of communication and personal contact with next link in the supply chain.
- the completion of audits.

## APPROVAL FOR THIS STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Ordnance Survey Limited's slavery and human trafficking statement for the financial year ending 31/05/2019.

This statement was approved by the Board of Directors in April 2019.

