

## Anti-Modern Slavery and Human Trafficking Statement

<b>POLICY NUMBER</b>	QTQISMS064
<b>EFFECTIVE DATE</b>	August 2019
<b>VERSION NUMBER</b>	1.1
<b>PERTAINS TO</b>	All colleagues



## Document Information

### Change Record

Author	Date	Version	Change Reference / Description
Michael Snow	21/12/2017	0.1	First draft
Michael Snow	15/06/2018	1.0	Updated and baselined
Daniel Leigh	09/08/2019	1.1	Updated branding and content for 2019

### Approvers

Name	Position	Email
Brian Shea	Qualitest Group UK MD	<a href="mailto:Brian.shea@qualitestgroup.com">Brian.shea@qualitestgroup.com</a>

### Reviewers

Name	Position	Email
Nighat Jabeen	UK VP People & Talent	<a href="mailto:Nighat.jabeen@qualitestgroup.com">Nighat.jabeen@qualitestgroup.com</a>

### Distribution

Name	Location
QISMS	QT.ONE, Qualitest Website



## Table of Contents

1. Purpose.....	4
2. Our Organisation.....	4
3. Our Supply Chain.....	4
4. Policies and Responsibilities.....	4
5. Due Dilligence .....	5
6. Training .....	5
7. Key Performance Indicators.....	6
8. Continuous Improvement.....	6



## 1. Purpose

Qualitest is committed to ensuring modern slavery is not present in its supply chains and has introduced, and will continue to develop, policy and procedures to manage the way it obtains goods and services to keep its supply chains robust.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Qualitest's slavery and human trafficking statement for the financial year ended 31 March 2019. This statement covers the activities of Qualitest, iBase of Fairfield and other Qualitest group of companies.

## 2. Our Organisation

QualiTest Group is a pure play QA and Independent software testing company which operates globally, primarily in the US, UK, Israel & India, employing people worldwide. Our employees typically work on-site at client companies or at our own facilities.

We are firmly committed to ensuring that modern slavery and human trafficking do not occur anywhere within our business and that our supply chains are free from such activity. We have a culture of respect for individuals in which slavery and human trafficking has absolutely no place. One of our stated values is "Respect others & yourself". QualiTest's recruitment selection process for all hiring decisions includes obtaining documented proof of the individual's right to work in the country in which they will be employed. We will always pay our employees and contractors at least the minimum wage rate applicable in the geography in which they work.

## 3. Our Supply Chain

As an international company, our key assets are our people, and our product is our testing services. The nature of our business (and the fact that physical manufacturing is not a business component) means that our supply chains are relatively limited in number and short, and the risk of modern slavery and human trafficking within our business is low.

Qualitest is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains, and to acting ethically and with integrity in all its business relationships.

## 4. Policies and Responsibilities

Qualitest has a Compliance function which has responsibility for its compliance, as part of this Qualitest has a number of policies which aim to minimise the risk of modern slavery in our supply chain. These include;

- **Supplier Security & Assessment Policy** which sets out internal requirements for on-boarding new suppliers and services;
- **Whistleblowing Policy** which encourages staff to report concerns including any related to modern slavery/trafficking and child or forced labour.



## 5. Due Dilligence

Although the nature of our business (and the fact that physical manufacturing is not a business component) means that our supply chains are relatively limited in number, and the risk of modern slavery and human trafficking within our business is low, we do however monitor suppliers we believe would present modern slavery risks in our supply chain.

All suppliers which we class as a potential risk must:

- Complete our Supplier Security Due Diligence Questionnaire which covers their governance, policies, training and supply chain management processes; and

The Qualitest governane team is responsible for assessing the information submitted by suppliers. Should a supplier fail to provide the information requested or to meet Qualitest's expectations, we will take appropriate action, which may include not entering into a relationship or terminating the relationship with the supplier concerned.

Our suppliers will be required to:

- Respect the firm's values in relation to treating people fairly, with dignity and respect
- Ensure that they and each of their subcontractors comply with all applicable laws, statutes and regulations relating to the Act.
- Purchase resources, products or services only from organisations who do not use forced labor in their operations
- To sign a statement of compliance and to notify the us should they become aware of any actual or suspected slavery or human trafficking occurring within their business or supply chain

The prevention, detection and reporting of modern slavery in all areas of our business is the responsibility of all those working for us, and we welcome this active participation. While our culture is such that we encourage staff to raise concerns openly, we also have a formal whistleblowing policy in place which is designed to make it easy for staff to make discrete disclosures through management, HR or hotline, the details of which will be publicly posted in each our sites as well as being disclosed through our employee portal and handbook. We post all notices as required by country, province and state in our workplaces regarding policies which state the rights and acceptable treatment of our employees, as required by law.

The information given to agency staff and all contractors will include summary information on the Modern Slavery Act and detailed information on who to contact should they feel that their human rights are being (or at risk of being) infringed.

## 6. Training

During the year, Qualitest governance have continued to provide advice and guidance to those teams who have direct responsibility for relevant suppliers. Qualitest also maintains a Modern Slavery Guidance document which is available to staff through Qualitest's own intranet (QT.ONE).



## 7. Key Performance Indicators

Qualitest have developed a process to continually measure the success and performance of our organisation by tracking key performance indicators (KPI's). A similar set of KPI's continues to be developed and applied to measure the effectiveness of our compliance with the Modern Slavery Act. KPIs to date include;

- Statistics relating to our supply chain risk and modern slavery training
- Volume of supplier risk reviews
- Number of higher risk suppliers independently audited
- Number of remedial actions agreed in respect of audit findings

We will continue to drive this programme forward, and as it matures, we will report further on progress in our next statement.

## 8. Continuous Improvement

Over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

We are currently looking to source enhanced training which we intend to rollout during 2019 for those involved in the procurement process. This will enhance our firm's knowledge and understanding of the requirements under the Act and will ensure that we know how to identify areas of concerns and how to deal with them.

Signed: *Michael Snow*

UK Director of People & Talent

