



## Modern Slavery Statement

### Introduction

The Modern Slavery Act 2015 mandates that businesses with an annual turnover exceeding £36 million publish a transparency statement detailing the measures taken to prevent modern slavery within their operations and supply chains. This document serves as Tieva's compliance with the Act.

TIEVA Ltd (hereafter referred to as the Group) is dedicated to fostering a workplace that upholds fundamental rights and freedoms. The company has zero tolerance for forced, bonded, or compulsory labour, human trafficking, and other forms of modern slavery within its operations or supply chains.

### Our Commitment

Tieva's approach to eradicating modern slavery is an integral part of its broader corporate social responsibility efforts, for which the Commercial Director is accountable. The company implements procedures to eliminate modern slavery from its business and supply chains and expects all business partners to adopt and enforce policies that comply with relevant legislation.

### Structure and Operations

TIEVA Ltd is a leading provider of IT services and solutions to UK SME, mid-market, enterprise and public sectors.

The Group includes the following entities:

- Pure Data Solutions, The Mill II, Holly Park Mills, Leeds, LS28 5QS
- Servatech Ltd, The Mill II, Holly Park Mills, Leeds, LS28 5QS
- Keytech Managed Solutions Ltd, The Mill II, Holly Park Mills, Leeds, LS28 5QS

The group currently has 170 employees and an estimated turnover of approximately £64m for the financial year 1st January 2024 to 31st December 2024.

### Our Practices

Considering the nature and locations of its business operations, TIEVA considers itself to be at low risk for potential modern slavery or human trafficking instances.

### Policies and Governance

The Group has a Modern Slavery Policy, reviewed June 2024, which clearly identifies expectations of its people and supply chain. The group is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout the supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015.

The policy applies to all persons working for us or on our behalf in any capacity, including employees, third-party representatives and business partners. The Board of Directors has overall responsibility for ensuring the policy complies with our legal and ethical obligations and the Commercial Director has primary and day-to-day responsibility for implementing the policy.

### **Due Diligence**

All employees are instructed to read this policy and confirm understanding and agreement to comply. The prevention, detection and reporting of modern slavery in any part of the business or supply chain is the responsibility of all working for TIEVA or under its control.

Anyone who believes or suspects that a conflict with the policy has occurred or may occur in the future, must notify their manager immediately who will take appropriate action. The group encourages openness and will support anyone who raises genuine concerns in good faith.

All supply chain entities (suppliers, partners and vendors) are carefully evaluated, and their own commitment and due diligence confirmed to ensure that they also comply with the law. This is confirmed at the “supplier on-boarding” stage and subsequent ad-hoc supplier reviews and audits.

### **Effectiveness**

Supply chain risk assessments are undertaken, and no issues have been identified during the onboarding process or scheduled audits and reviews during financial year ending 31<sup>st</sup> December 2023.

### **Risk Assessment and Management**

The group has a risk-based methodology in place to ensure its suppliers comply with The Modern Slavery Act 2015. Risks are identified as being low, due to the fact our supplier base comprises of globally recognised manufacturers. It is also recognised that risks are lower for UK employees due to the legislative requirements. The risk assessment process is managed by the Group Procurement Manager who also has responsibility for ensuring annual or ad-hoc reviews and audits of all suppliers is undertaken.

### **Planned Initiatives**

In 2024, Tieve plans to implement the following measures to further safeguard against the risk of modern slavery and trafficking:

- Additional awareness training for other departments deemed to have an (albeit minor) exposure to modern slavery risk.
- A review of the Supplier Code of Conduct to ensure provisions against the risk of modern slavery align with best practices, and implementation of an annual review process.

- A review of terms and conditions documentation, including a direct reference to adherence with modern slavery legislation.
- Improved ongoing due diligence procedures concerning modern slavery risk in the supply chain.
- A formal policy for the procurement of merchandise and other marketing materials from suppliers, reinforcing the importance of sustainability and acceptable employee practices.

### Approval

This statement has been written and approved by the Board of Directors of the Group for the financial year ending 31<sup>st</sup> December 2024 and is signed by:



Steve Norman

Commercial Director