



Modern Slavery and Human Trafficking Statement

19th January 2022

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 01 November 2021 and 31st October 2022.

The statement sets down Sight and Sound Technology Limited commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Sight and Sound Technology Limited which are as follows:

Sight and Sound Technology is the UK's leading provider of hardware and software to the blind, visually impaired and those with learning and reading difficulties. We work in unison with private individuals, charitable organisations, educational establishments and commercial enterprises to help our users fully realise their potential. Our product solutions have been specifically designed to improve quality of life at work, at study or in the home.

Sight and Sound Technology is a nationwide company comprising of 35 staff. Our Head Office is located in Northampton, which enables us to provide our customers with responsive training and support at the location of the end-user. We work in conjunction with our customers and suppliers to ensure that their experiences are factored into new products that we develop in combination with our partners, the leading companies in this industry.

The Company currently operates in the following countries:

United Kingdom, Ireland and Malta.

The following is the process by which the Company assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking:

Assessment of modern slavery risk

We continued to review the risk of modern slavery in our business and supply chain by considering geography, the type of work being carried out and the type of labour being used. Based on this, we believe that the risk of modern slavery in our directly employed workforce is low.

This is because our employees are largely educated or skilled, or are undertaking work in controlled environments where there are established policies and processes. We have, however, recognised the need to better understand the use of labour providers in our complementary workforce and supply chain. This is especially relevant for labour-intensive activities that carry a higher risk of modern slavery such as catering, cleaning, transportation, warehousing, construction and some types of manufacturing. This will be an area for further analysis over the next year.

The policy of Sight and Sound Technology is to conduct all of our business in an honest and ethical manner, and to comply with all applicable legislation.

We strive to ensure that neither modern slavery nor human trafficking supports our supply chain or our businesses; this objective is implicit in our policies and procedures. We aim for a zero-tolerance approach to violations of anti-slavery and human trafficking laws. If breaches of these laws are found within our supply chain we will look to support organisations in their efforts to comply with the applicable legislation. However we will review the continuation of business with individuals and organisations found to be involved in slavery, human trafficking, forced or child labour and retains the right to cease business with such individuals and organisations on this basis.

Sight and Sound Technology are committed to acting professionally and with integrity in all its business dealings and relationships whether in Ireland, UK or abroad.

As part of our compliance processes, we will always and we expect our supply partners to confirm that they meet the legal obligations within its domestic market place as regards: -

- Employment is freely chosen.
- Local laws covering the minimum age of employment are enforced and enforcement checks are made In the UK no person under 16 years old is employed on a regular basis other than training or work experience.
- Freedom of Association is allowed.

- Working conditions meet the national legal minimum.
- Compensation meets or exceeds the national legal minimum.
- Working hours do not exceed the national legal maximum.
- Policies exist to protect staff against discrimination within the workplace and a process exists for employees to raise grievances.

No exceptions to these requirements are made regardless of the commercial consequences.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Reporting knowledge or suspicion of slavery or human trafficking

All employees and partners have a statutory obligation to report knowledge or suspicion of slavery or human trafficking. Any genuine suspicion or knowledge of slavery or human trafficking is to be immediately reported to the relevant Engagement Partner and to the CEO, who will decide what further action, if any, is deemed necessary. If the issue being reported also relates to knowledge or suspicion of money laundering or terrorist financing then a further reports will be submitted to the local authority.

Supply Chain/Procurement

We recognise that our company is exposed to a low risk of slavery and human trafficking when dealing with suppliers of products and services, particularly those who have operations and suppliers in other territories. However we consider that the majority of our suppliers are not in industries with a high risk of modern day slavery. In addition our supply chains are primarily confined to US and Europe and countries within which, there is also a relatively lower risk of modern day slavery and human trafficking.

Responsibility for the Company's anti-slavery initiatives is as follows:

1. Policies: The CEO, along with the aid from the Head of Operations is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting to the needs of the Company.
2. Due diligence: The Head of Operations is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to complete an online training course.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

Whistleblowing Policy is highlighted to employees and partners on a reoccurring basis. This policy facilitates and encourages employees and partners to raise concerns or disclose information which relates to wrongdoing, illegal practices or unethical conduct which may come to their attention through work (including concerns that may relate to modern slavery and human trafficking).

Sight and Sound Technology have a number of further policies and documents which reflect our objective to act ethically and in line with our legal and regulatory obligations with regard to our employees, clients and our business relationships:

- Ethics and Quality Control Manual;
- Staff Handbooks;
- Anti-Money Laundering Compliance Manual; and
- Anti-Bribery and Corruption Policy.

These policies and documents will continue to be reviewed on, at minimum, an annual basis.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all staff to have completed training on modern slavery.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Management Team endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Glenn Tookey
Position: CEO
Date: 19/01/2022

Signature: 