

# Modern Slavery Statement

## Background

Modern Slavery is a term used to encapsulate the offences in the Modern Slavery Act 2015; slavery, servitude, forced or compulsory labour; and human trafficking.

## Definitions

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom.

Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Forced or compulsory labour is defined in international law by the coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

Human Trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.

## Modern Slavery Act 2015

The introduction of the Modern Slavery Act 2015 requires BravoSolution UK Ltd (a JAGGAER Company) to be transparent regarding the welfare and wellbeing of its employees and those working on its behalf.

The act defines a commercial organisation must prepare a slavery and human trafficking statement for each financial year of the organisation if it supplies goods and/or services and has a total annual turnover of not less than an amount prescribed by regulations made by the Secretary of State, currently £36m. BravoSolution UK Ltd is a **JAGGAER** Company whose total annual turnover globally exceeds this amount, and thereby requires that we adhere to the act.

By promoting equality throughout the organisation beginning at the point of recruitment and by focusing on supply chain accountability, more people will be protected and our clients will have greater confidence in services they buy.

## Policy Statement

The following statement describes the steps JAGGAER will take during our financial year which runs 1<sup>st</sup> January to 31<sup>st</sup> December, in this case 2019, to ensure that slavery and human trafficking is not taking place and refers specifically to the UK business to ensure that servitude or forced or compulsory labour is not practised within the business. The statement will reference Company policies and procedures where necessary to support the statement. It outlines the Company's recruitment and employment standards, Equal Opportunity Policy and management process.

Our aim is to provide transparency in this area and we are committed to providing a continued annual statement for each financial year.

JAGGAER confirm adherence to all local and relevant legislation and regulations and will regularly review the policy statement to ensure continued compliance.

This policy is available externally on request and published internally on the Company intranet under *Human Resources*.

## Organisation and Employees

JAGGAER is the world's largest independent spend management company, with over 1,850 customers connected to a network of 3.7 million suppliers in 70 countries, served by offices located in North America, Latin America, throughout Europe, the United Kingdom, Australia, Asia, and the Middle East. JAGGAER offers complete SaaS based indirect and

# Modern Slavery Statement

direct eProcurement solutions with advanced spend analytics, complex sourcing, supplier management, contract lifecycle management, savings tracking, and intelligent workflow capabilities. We have pioneered spend solutions for over two decades and continue to lead the innovation curve by listening to customers and analysing the market. Our solutions suites are trusted by the world's largest education, manufacturing, health care, retail, consumer package goods, logistics, construction, utilities companies and public service organizations. Additionally, JAGGAER holds 38 patents, more than any other spend management company [www.JAGGAER.com](http://www.JAGGAER.com)

The UK organisational structure is available from Human Resources.

JAGGAER invests in people for quality, responsiveness and excellence in service delivery, promoting an open and communicative management style to ensure employees feel part of a team and engaged with the Company. Our standards for employment and recruitment are communicated in the form of various policies and documents. These are available to all employees on the Company Intranet, as part of our Employee Handbook and communicated in a number of ways around the business including notice boards and quarterly communications.

All Company policies and procedures are reviewed annually or when a significant legislation or regulation change occurs.

References:

- JAGGAER Employee Handbook
- Equal Opportunities Policy
- Recruitment & Selection Policy

JAGGAER has written policies for raising concerns at work, outlining the procedure for making a disclosure. This allows employees to raise a concern they might have relating to any area of the business, its standards and compliance, in confidence.

References:

- Grievance Procedure
- Whistle Blowing Policy

## - Anti-Corruption & Bribery

We promote a culture of openness through candid communication, honesty and integrity, inclusion, mutual trust and respect, teamwork, constructive positive attitudes, a supportive no blame culture and one where people want to work for us.

We are committed to the principle of equal opportunities in employment and comply with the Equality Act 2010 with respect to the nine protected characteristics.

JAGGAER follow a documented Recruitment Policy and Procedure and have strict guidelines in place to support the recruitment process.

We have a documented Grievance Procedure for the reporting of unlawful discrimination in any form.

JAGGAER has a Training and Development Policy to ensure the transparent and fair development of staff through communication and training opportunities.

The Company Corporate and Social Responsibility (CSR) Policy provides clear responsibility regarding expected behaviour and social standards both whilst at work and outside of the work environment.

References;

- Grievance Procedure
- Training & Development Policy
- Corporate & Social Responsibility Policy

## Suppliers and Contractors

JAGGAER has a process for the sourcing and approval of third-party suppliers to the Company. We hold a Supplier Register which documents all third-party suppliers to the business. We require that suppliers agree to comply with our Supplier Code of Conduct detailing controls and standards relating to labour and human rights and business and management practices and ethics. Reference:

- Supplier Code of Conduct

Violations of the Supplier Code will result in the termination of the business relationship with a supplier.

Copies of all Supplier Terms and Conditions are held alongside the signed Code of Conduct.

# Modern Slavery Statement

As a service-based Company JAGGAER suppliers are predominately based in the UK and are limited to the following areas;

- Facilities/Consumables/Stationery
- IT Operations
- Waste and Environmental Management
- Recruitment
- Audits

JAGGAER are subject to audits from external certifying bodies for quality, environmental, health and safety and information security, and is currently accredited to the following standards:

- ISO9001:2008 Quality Management
- ISO20000-1 IT Service management
- ISO27001 Information security management systems
- ISO27018 Code of practice for protection of personally identifiable information (PII) in public clouds acting as PII processors
- ISO22301 Business continuity management systems

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*Any queries related to this policy should be directed to HR.*