



Modern Slavery Statement and Policy

for the period of January 2024 to December 2024

Stone's organisation structure and supply chains

About Stone

As a Staffordshire-based business, Stone Technologies Limited, a Converge Company provides IT products and services within the United Kingdom and Europe.

Stone strives to make a true and lasting difference to the way IT is sold providing a full circular procurement cycle for customers for the good of the environment and future generations.

We empower our customers to improve the education, health, and quality of life of people in the UK, or to transform their businesses creating greater productivity and value. Our journey began in 1991, and since then we have assisted thousands of organisations in adapting and thriving in the continually changing technology landscape, through deploying valuable technology, delivering bespoke IT services, and providing reliable support.

Stone is a UK technology reseller with an onsite recycling facility, accelerated by the award-winning Stone 360 app. As a technology provider, our customers demand that we champion a more sustainable future. From schools to universities, hospitals to government, small start-ups to large-scale corporate offices – Stone develops IT solutions to fit our customers' needs with the outright confidence that we can help them to achieve their IT goals.

A vital component of delivering products and services to our customers in a responsible manner, attracting and retaining top talent, achieving sustainable growth and by offering innovative solutions delivering value for money, is our Modern Slavery Statement and Policy.

This document sets out how we identify and mitigate risks as a business, the related processes we execute, and the policies our employees and suppliers must comply with and support to meet both the requirements of the Modern Slavery Act 2015, our own core values, and our Code of Business Conduct. The following statement and policy information outlines our efforts in this regard during the year ending 31st December 2023, and our plans going forward for 2024. It is applicable to all products and services supplied by Stone, and all employees, contracted resources, and suppliers (without exception).

At Stone we will not tolerate any form of human rights abuse, including modern slavery or human trafficking, in any part of our business or within our supply chain.

About our supply chains

Stone has an extensive range of suppliers, subcontractors and partners registered on our approved supplier list. Potential suppliers wishing to supply goods or services to our customers must align with our Modern Slavery standards and codes of conduct in line with industry practice (most notably, as directed by the Chartered Institute of Procurement and Supply (CIPS)).

All suppliers and subcontractors are required to comply with our mandatory onboarding process. During onboarding (and then again at revalidation of suppliers), we require suppliers to complete a detailed questionnaire. This questionnaire includes:

Stone Technologies Limited, A Converge Company

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- Confirmation and agreement to abide by our Modern Slavery Statement and Policy, and other related policies, such as our Health and Safety Policy Statement and Supplier Code of Conduct.
- Completion of our Modern Slavery Questionnaire, including a request to allow access to from external auditors (if applicable)

All (100%) employment agencies that may be used by Stone to provide labour services will undergo assessment of their Modern Slavery processes and procedures prior to use.

Policies in relation to modern slavery and human trafficking, and our governance structure

The Board of Directors, facilitated by Stone's Chief Procurement Officer and supported by the Director of People Operations implements, and oversees our company-wide human rights commitments (found within the policies and procedures below) and the design of processes to prevent, mitigate, and remediate related impacts, including any relating to modern slavery:

- Modern Slavery Statement and Policy
- Environmental Policy
- Information Security Policy
- Health and Safety Policy
- Grievance Policy and Procedures
- Disciplinary Policy and Procedures
- Equality, Diversity, and Inclusion Policy and Procedures
- Sustainability Policy
- Code of Business Conduct
- Concerns About the Behaviour of Others ("Whistleblowing"). Whistleblowing Policy and Procedures

This combined annual statement and policy is led, prepared, and is ultimately owned by the Chief Procurement Officer. However, in recognition that all business functions across the company play a role in addressing modern slavery risks, the following functions were specifically consulted in the preparation of this joint statement and policy:

- Human Resources
- Warehouse & Logistics
- Technical Services
- IT Asset Disposal Services and Operations
- Procurement and Supply Chain Operations
- Commercial and Sales
- Marketing
- Research and Development
- Bids and Tenders
- Sustainability
- Risk and Compliance



Stone recognises and supports the United Nations' Universal Declaration of Human Rights through its own policies and procedures.

Due diligence

Integrity in our practices

Respect for human rights is embedded in our core values, of “we believe in people”, acting with respect towards each other, our customers, and our partners. We act with “integrity”. Collectively, we are ethical, our instinct is always to do the right thing, to take personal and collective responsibility, and we as Stone employees, are accountable for our actions.

This responsibility, respect and accountability is embedded within our core values, and applied across our value chain, and in the communities where we do business. Commitment to our values is a requirement for every Stone employee, and these values imbed compliance and integrity in our behaviours throughout our operations. We are committed at both an organisational and as individuals to complying with all applicable laws and regulations wherever we provide goods and services.

Identifying areas of risk

As an IT manufacturer and IT Asset Disposal partner, Stone is aware has a high level of awareness of any potential risks in its supply chain and operations. We also have good, long-standing relationships with our suppliers (Tier One Partners and component suppliers for our own brand hardware), who have robust policies, governance and dedicated teams managing their own supply chain and operational risks.

However, as part of our supplier onboarding process and revalidations, and engagement with industry best practice subject matter experts, we have identified higher risk suppliers, such as those in Asia Pacific and recruitment organisations.

Suppliers Code of Conduct and audits

We undertake periodic risk assessment reviews to identify key modern slavery and human trafficking risk in our business and supply chain. As a firm we continue to look for ways in which to minimise the risk of modern slavery occurring in our supply chain.

At the time of onboarding and revalidation, and on review, completion and agreement of the Modern Slavery Questionnaire, suppliers are asked to confirm their agreement to audit of their processes and policies. Each supplier is also asked to confirm its agreement to the appointment of an external auditor, should Stone choose to do so. As part of this process, any resistance to this requirement is a ‘red flag’. Engagement is made with the supplier (for example, suppliers may initially resist due to concerns around potential disruption to operations), and agreement is gained to audit within a mutually agreeable period. If the supplier continues to refuse audit, Stone may at this stage engage independent guidance.

The obligations set out in our code of conduct are strengthened by our standard supplier’s terms, which provide the right to immediate terminate agreements by written notice to a supplier in specific circumstances, including any breach of any applicable law (including the Modern Slavery Act) or a material breach of the Code of Conduct.

Fair pay for Staff

We are committed to ensuring that all our people are paid fairly and we ensure we meet the UK national living minimum wage standards. We do not have zero hour contracts.



Recruitment

Our recruitment team work closely with our compliance and risk management team to ensure that our recruitment and screening practices are fit for purpose and that any instances of modern slavery are identified, reported and appropriate action taken as soon as practicable.

Stone's recruitment team have undergone Modern Slavery training which includes awareness of signs which may indicate that an individual is a victim of Modern Slavery. Applicable checks are also undertaken as part of the onboarding process which is itself subject to external audit on a regular basis.

Training

During 2023 we provided modern slavery refresher interactive training and Whistleblowing interactive training to our employees and display posters raising awareness of modern slavery. This training forms part of a mandatory ongoing programme of refresher training for all staff, completion of which is monitored, measured and reported on throughout the year.

All staff undergo a comprehensive in house induction training programme, completion of which is measured to ensure that 100% of new starters have completed their mandatory training within the set timescales.

We are also members of the Supply Chain Sustainability School which provide a wide range of further training material on Modern Slavery and Human rights.

Reporting

Our Whistleblowing Policy contains guidance on how to raise any concerns that our people may have in our business or supply chain, including modern slavery. They can raise any breaches with an appropriate manager, executive team member, company auditors or the Converge anonymous online form. Alternatively they can contact the charity "Protect" on <https://protect-advice.org.uk/> or by telephone 020 3117 2520. The Whistleblowing Policy contains a process, including timescales, for initial acknowledgment (3 days) and subsequent investigation of any reported concerns (14 days). If evidence were to be discovered of criminal activity the police would be informed.

We have published our 2023 Modern Slavery statement on the UK Government's Modern Slavery Act statement registry. <https://supplierregistration.cabinetoffice.gov.uk/msat>

During 2023 no complaints or concerns were raised about modern slavery or human trafficking taking place to Stone Technologies Limited.

Internal KPIs and quantitative objectives are set and monitored through Stone's Zero Harm programme which is reviewed and reported during monthly company wide safety committee meetings. Trends are identified and addressed, as appropriate.

Communication

Stone is a forward thinking, ever-changing business, acting with purpose and integrity, with identification of risks in modern slavery throughout all of its operations. The culture is one of openness and honesty, allowing all employees to grow and develop within the company, with external specialism bought in wherever needed. There is a growth mindset, and open communications.

This supports early risk identification by providing:

- A structured communications framework, including team meetings, team briefings, noticeboards, and an active engaging intranet with modern workplace tools.
- A confidential whistleblowing process, to provide reassurance to employees that they are protected by law in the event of a confidential report.

- A comprehensive suite of mandatory onboarding training courses to be completed in the first two weeks of employment, followed up by refresher training. These courses are designed to educate all employees on the risk identification and management of topics such as Modern Slavery, Safeguarding, and Equality, Diversity and Inclusion.

Engagement with CIPS on Modern Slavery related topics such as the Eliminate Supply Chain Slavery Campaign, to raise awareness, then share information within Stone on what Modern Slavery is.

Stone's supply chain staff team participate in the Supply Chain Sustainability School's training programme, and the CIPS Corporate Ethics kitemark.

Achievements in 2023/2024

1. Achieved Silver Accreditation from Ecovadis for Stone including Labour and Human Rights where we are in the top 10% of companies rated by Ecovadis in the manufacture of computers and peripheral equipment industry
2. Monitored our Protecting Human Rights focus within the 3 year Making a Digital Difference Sustainability Framework
3. Worked with our nominated charity Shelter who support disadvantaged communities including victims of Modern Slavery.
4. Measuring social value calculator for activities across the group which has the capacity to capture the % of supply chain which have completed supply chain mapping to reduce the risks of modern slavery
5. Completed second year of Ethical Procurement course through CIPS and achieved the Corporate Ethics Mark demonstrating our commitment to ethical procurement and supply practices.
6. Completed assessment of recruitment agencies for modern slavery policies and procedures.
7. Supported the research for London University Purchasing Consortium (LUPC)
<https://modernslaverypec.org/resources/climate-change-modern-slavery-public-procurement>

Our key aims for 2024/2025 are:

1. Continue to deliver Stone's action plan within the protecting human rights pillar over the next 3 years
2. Supplier evaluation of high risk suppliers including raw material sourcing
3. Complete a supply chain mapping exercise with key suppliers to reduce the risk of modern slavery.
4. Review training resources and update accordingly.



Simon Harbridge

Chief Executive Officer

April 2024