

Modern Slavery Statement and Policy

for the period of January 2022 to December 2022

Stone's organisation structure and supply chains

About Stone

As a Staffordshire-based small to medium-sized business, Stone Group provides IT products and services within the United Kingdom (including Northern Ireland). We employ over 400 employees.

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 the only UK 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 2021, and our plans going forward for 2022. It is applicable to the supply of all products and services supplied by Stone, and all employees, contracted resources, and suppliers (without exception).

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, 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 new suppliers to complete a detailed questionnaire. This questionnaire includes:

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

Stone Group

Granite One Hundred | Acton Gate | Stafford | Staffordshire | ST18 9AA

T 08448 22 11 22 | F 08448 22 11 23 | www.stonegroup.co.uk | Co. No. 02658501 | VAT No. 747 8788 57



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

The Board of Directors, facilitated by Stone's Chief Procurement Officer and supported by the Head of Human Resources 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
- 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
- Supply Chain Operations
- Warehouse & Logistics
- Technical Services
- IT Asset Disposal Sales and Operations
- Procurement
- Commercial (Sales Directors)
- Marketing
- Research and Development
- Bids and Tenders

Due diligence

Integrity in our practices

Respect for human rights is embedded in our core values, of believing 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 has a high level of visibility of any potential risk 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

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process and revalidations, and engagement with industry best practice subject matter experts, we have identified higher risk suppliers, such as those in Asia Pacific.

Supplier audits

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. The supplier is also asked to confirm their 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 continued to refuse audit, Stone may at this stage engage independent guidance.

Risk assessment and management, including training on modern slavery and trafficking

Risk detection

Stone is a forward thinking, every-changing business, acting with purpose and integrity, with identification of risks in modern slavery throughout all of Stone's operations. The culture is 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.
- Opportunities for 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, what the new rules mean, and:
 - Stone's supply chain staff team participate in the Supply Chain Sustainability School's training programme, and the CIPS Corporate Ethics kitemark
 - Stone's aim to become recognised on the CIPS register in 2022.

Key performance indicators

As a result of the positive engagement with our Tier One Partners and component suppliers and of our own robust process management and training, we believe we have identified our key risks for the next 12 months and put in place appropriate mitigation methods.



TECHNOLOGY
DESIGNED, SERVED AND SUSTAINED

Our response to Covid-19

The Covid-19 pandemic provided Stone with the opportunity to reassess how we manage our operations and supply chain to address the severe risks of the disease to workers and communities. Covid-19 has had minimal impact on the risk identification, management, and potential for audit of Stone and its suppliers, due to the growing virtualisation of processes within the IT industry.

A handwritten signature in blue ink that reads "Simon Harbridge".

Simon Harbridge
Chief Executive Officer

February 2022

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