

## **Piksel Limited Modern Slavery Act Statement**

### **Introduction**

Piksel Limited (hereinafter 'Piksel', the 'Company', or 'we') is proud of the steps we have taken to combat slavery and modern human trafficking. This Modern Slavery Act Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of Piksel on 13 December 2019 to constitute Piksel's Modern Slavery Act Statement for the financial year ending on 31<sup>st</sup> December 2018. The Statement reflects Piksel's efforts to combat the conduct at the heart of the Modern Slavery Act's provisions and is intended to provide its suppliers and clients the ability to make better, more informed choices about the products and services they purchase and the companies they support.

### **Company structure**

Piksel is a company incorporated in England with limited liability with registered company number 03048367. Piksel, along with the other entities in the Piksel Group, builds successful online video businesses offering strategic, professional and managed services underpinned by the Piksel Palette's™ SaaS-based infrastructure. Piksel also provides IT infrastructure, professional and managed services to customers in other industry verticals, such as government, health, retail, transport and telecommunications. The Piksel group operates across numerous jurisdictions. Piksel operates a strict supplier selection process and have a close knowledge of key suppliers with whom we have long-standing relationships. Whilst we source the majority of our goods and services from the European Union and North America, we recognise that other jurisdictions from which we may source goods and/or services may be more at risk. Piksel is committed to conforming to ethical business practices in all of its operations worldwide.

### **Our Policies on Slavery and Human Trafficking**

Piksel is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. We are committed to maintaining and improving systems and policies designed to reduce the possibility of complicity in human rights violations relating to our own operations, our supply chains, and our products. This policy is endorsed and supported by members of Piksel, including the Board of Directors. This reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains nor in any part of its business.

### **Our Core Anti-Slavery policies**

Piksel has established an integrated approach to managing human rights across its businesses, including risks relating to slavery and human trafficking. As part of its centralised supplier procurement practice, we seek to identify and mitigate risks through using pre-approved suppliers and have implemented due diligence procedures to:

- Ensure that the Company operates in a legally and ethical manner;
- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chain;
- Monitor potential risk areas in our supply chains.

### **Our People**

Piksel employs almost five hundred people directly and through a number of business partners. We recognise that where workers are employed through business partners or recruitment agencies, we are not directly responsible for the employee relationship or how they manage their employees. To mitigate this risk, we require certain contractual standards which are supported by the way we work.

### **Our Business Operation**

Our business is organised into a number of business units, the majority of which is in the delivery of IT Infrastructure, Operational Managed Services, Software as a Service and Development Services. Consequently, our businesses and suppliers are largely performed by technical and professional persons. The risk of modern slavery is therefore low. Nonetheless, we still recognise that roles including security and cleaning tend to have higher risk of poor labour conditions and visibility can be limited if the workforce is not employed by Piksel directly.

### **Our Supply Chains**

We have invested significant time and resources in collaborating with others to address system level, industry-wide improvements. Piksel undertakes efforts aimed at minimising the chance that there is human trafficking or slavery of any form in our supply chain. Piksel operates a strict supplier selection process and has a close knowledge of key suppliers with whom we have long-standing relationships. Whilst we source the majority of our goods and services from the European Union and North America, we recognise that other jurisdictions from which we may source goods and/or services may be more at risk.

For these areas, there are action plans in place to better understand the nature of any risk and to implement supportive actions where necessary. Actions include updating contractual standards and suppliers briefing packs to direct supplier engagements and audits.

### **Supplier Adherence to Our Values**

Piksel takes steps to verify, evaluate, and address risks of slavery and human trafficking in our supply chains. Under our zero-tolerance policy, we set clear expectations for all our suppliers. The main areas of our supplier compliance programme include the following:

- Taking all reasonable measures to ensure suppliers comply with all applicable laws and regulations;
- Seeking contractual warranties from suppliers which our risk assessment procedures have identified as being higher risk of violating relevant legal rules and regulations;
- Conducting an assessment to measure the effectiveness of steps already taken; and
- Establishing due diligence procedures that monitor supplier's compliance with the Modern Slavery Act.

Piksel undertakes an annual risk assessment process and reviews action plans on an on-going basis.

Piksel requires its major suppliers to verify compliance by way of a self-assessment questionnaire to determine the risk profile of suppliers for environmental, safety, human rights (including slavery and human trafficking) and other supplier sustainability issues.

### **Training**

Piksel values the importance of articulating its expectations of employees and suppliers to adhere to the highest standards of honest and ethical conduct. Specifically, Piksel provides training to its employees and business partners, thus ensuring a high level of understanding of the risks of modern slavery and human trafficking and strict adherence to the standards set forth in the Modern Slavery Act 2015. Piksel seeks to promote honest and ethical conduct, deter wrongdoing, and support compliance with applicable laws and regulations.

The Board of Piksel has concluded that the aforementioned procedures have provided reasonable assurance that Piksel has mitigated the risk of slavery and human trafficking in any of its businesses or supply chains.

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Peter Heiland  
Director, Piksel Limited  
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