

# Modern Slavery Statement

## 2022

## INTRODUCTION

Modern slavery in all its forms of slavery and servitude, forced or compulsory labour and human trafficking is a crime and will not be tolerated in Dogma Group's operations or supply chain.

We will take appropriate steps to ensure everyone who works for Dogma Group in the UK and Internationally has their fundamental human rights respected and anyone we do business with upholds these principles. This statement details policies, processes and actions we have taken to ensure that slavery and human trafficking do not take place in our supply chains or our businesses.

## OUR BUSINESS

Our Mission– 'To Always Be Our Customers' Most Trusted Advisor' – is the driving force behind our business. We want to be a truly caring and responsible organization for:

**Our people** – by providing a work place & teams in which they are always comfortable and develop.

**Our clients and customers** – by ensuring positive outcomes drive our advice & activities.

**Our suppliers and partners** – by working hand in hand to produce mutual & fair benefits.

**Society** – by acting as a responsible business for the communities we serve.

To deliver our purpose successfully, our values – HEART – must guide all our behaviours. We are people-focused with skilled and committed employees who have deep understanding of our clients' goals and needs. We operate in the UK, Europe, East Asia and across the Globe on behalf of our customers. We create value and better outcomes for all in how we design, implement and operate essential services. Although relatively small, our supply chain is critical to our success and the agility, speed and value we need to be competitive.

THIS MODERN SLAVERY STATEMENT COVERS THE ACTIVITIES OF ALL BUSINESSES IN ALL JURISDICTIONS WITHIN THE SEELOGIC LIMITED GROUP OF COMPANIES FOR THE FINANCIAL YEAR ENDED 31 AUGUST 2022, REQUIRED UNDER THE PROVISIONS OF THE MODERN SLAVERY ACT 2015 (THE "ACT")

## TACKLING MODERN SLAVERY – OUR PEOPLE

To ensure we recruit and treat employees fairly, our human resources (HR) policies set out our procedures on how we:

### **Recruit**

Recruit and select employees in a fair, lawful and professional manner, both for internal and external candidates. We only use approved recruitment agencies that comply with all UK legislation relating to the employment rights and welfare of candidates.

### **Working hours regulations**

Dogma Group through expansion and dedication to provide high quality services at affordable cost wanted to use the best candidates in a location which provided a time-zone advantage for our clients. This was to enable the business to carry-out two days of work per day without breaching work hour regulations and deliver accelerated deployments. Dogma Group in its dedication to Modern Slavery and Human Trafficking prevention, evaluated options and decided the best mitigation strategy was to set-up a wholly owned subsidiary called Dogma International which employs all the team members of Centres of Excellence. This enabled us to ensure that we could control the recruitment and ensure the Base Code of the Ethical Trading Initiative was upheld.

### **Fair treatment**

Treat all employees fairly during their employment and have in place procedures to raise a grievance or involve a local trade union, where they exist, or where this is a legal requirement to do so. If an employee feels they have been treated unfairly. Dogma Group provides an anonymous reporting mechanism for all staff to raise concerns. In addition, Dogma Group has a Whistleblowing Policy.

### **Exit**

Manage the exit of an employee in a fair and consistent manner.

## TACKLING MODERN SLAVERY – OUR SUPPLY CHAIN

We are committed to acquiring goods and services for use without causing harm to others. We fully support the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights. As part of our commitment to identify and eradicate slavery and human trafficking, we endeavour to undertake due diligence on our supply chains to ensure compliance with legislative obligations, and will continue and evolve this process in future years.

In implementing this approach, we support the Base Code of the Ethical Trading Initiative:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

All slavery and human trafficking laws must be complied with including, but not limited to, the Act. Suppliers must ensure their business operations are free from slavery and human trafficking practices. This includes whether in the UK or elsewhere, both internally and within their own supply chains and other external business relationships.

## TRAINING AND COMMUNICATION

To ensure employees aware of the drivers of modern slavery this statement is shared with all employees. It is also available on our website ([www.dogmagroup.co.uk](http://www.dogmagroup.co.uk)). We also train key staff on the issues.

We see this as an on-going process and will continue to strengthen our approach to managing the risk of modern day slavery within our business and supply chains, through policies, training and communications

We will maintain effective and continued focus on employee and suppliers' awareness of how we expect everyone to conduct business responsibly, focusing on treating people fairly and equally, acting lawfully and the process involved to raise ethical concerns.

Board approvals This statement is made pursuant to section 54(1) of the Act, has been approved by the Dogma Group Directors and senior managers, and will be updated regularly in line with the Modern Slavery Act's requirements.

**Eddie Harford**

CHIEF EXECUTIVE OFFICER

March 2022