

DUXBURY

N e t w o r k i n g

Modern Slavery Policy

Effective as of 01 January 2018

Introduction

Duxbury Networking specialises in the import and distribution of networking equipment and has a global supply chain. Duxbury Networking recognise that Modern Slavery is a complex issue and is therefore committed to working with our Customers, Suppliers and Employees to prevent human trafficking and modern slavery from within our own business and our supply chains.

We hold ourselves and our supply chains accountable for complying with the provisions of the Human Trafficking Act No. 7 of 2013, Basic Conditions of Employment Act No. 75 of 1997 and the Bill of Rights in the Constitution of the Republic of South Africa, 1996.

The offence of modern slavery comprises slavery, servitude, forced or compulsory labour and human trafficking and Duxbury Networking has a zero tolerance approach to Modern Slavery of any kind within our operations and supply chains.

Duxbury Networking prohibits these practices and is committed to conducting its business in an ethical manner, affording its people respect and promoting their self-worth.

Supplier Relationships

Duxbury Networking will not support or deal with any business knowingly involved in slavery or human trafficking.

Our supplier base is reviewed regularly by senior management and any risks of Modern Slavery assessed. Should any suppliers and contractors be deemed to be anything other than low risk, they will be required to confirm that they comply with the principles and requirements of the Modern Slavery legislation, as well as their commitment to ethical trading and management.

Code of Conduct

All employees are expected to act with professionalism, integrity and ethically at all levels. In turn Duxbury Networking expects our partners, suppliers and agents to behave in the same manner, ensuring no slavery, servitude, forced or compulsory labour or human trafficking takes place within their business or their own supply chain, including adults and children being forced to work against their free will.

Our Commitment

Duxbury Networking recognises that it has a responsibility to take a robust pro-active approach to modern slavery and human trafficking.

This policy and our performance in relation to Modern Slavery will be reviewed annually.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

All our Customers, Suppliers and Agents are required to indicate their policy and approach to modern slavery and human trafficking and to detail what policies and procedures they have in place to ensure that they, and in turn, their supply chains are able to demonstrate compliance with the Acts.

Human Resources

Key personnel within the business are provided with relevant knowledge to fulfil our obligations and employees are encouraged to disclose any concerns that they may have about slavery and/or human trafficking in our organisation or our supply chains.

Duxbury Networking ensures and is committed to not employing young people under the legal employment age in any country in which we operate, and that we apply the highest standards of integrity to the recruitment and management of staff in all our companies.

Responsibility

Duxbury Networking undertakes:

- Implement policies and to action, train and review these policies regularly.
- Investigate and conduct due diligence in relation to known or suspected instances of slavery and human trafficking within the business, customers, suppliers and agents.

If any of our employees have concerns they are expected to report them to Senior Management and they in turn are expected to act upon them.

Leadership

The Company Directors and Senior Management take the responsibility for implementing this policy statement and its objectives and shall provide adequate resources and learning to all staff and employees to ensure that slavery and human trafficking is prevented within the organisation and its supply chains.

Graham Duxbury
Chief Executive Officer
Duxbury Networking

01 January 2018