

# MODERN SLAVERY STATEMENT

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## A) ORGANISATION

This statement applies to QGate Software Limited (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2023/2024.

## B) ORGANISATIONAL STRUCTURE

QGate Software Limited is part of a group of companies, wholly owned by QGate Holdings Limited. The group of companies also includes associated company, QWARE Limited, wholly owned by QGate Holdings Limited. The Organisation is controlled by a Board of Directors. The Organisation’s registered address is Ground Floor Cromwell House, 15 Andover Road, Winchester, England, SO23 7BT.

The Organisation provides services to support small to medium sized organisations optimise their business processes, transform the way their people work, and enhance their customers’ experience through CRM oriented business applications. To enable this, the Organisation resells appropriate technology solutions.

The labour supplied to the Organisation in pursuance of its operation is carried out in United Kingdom and Channel Islands and outsourced external agencies (current providers are based in New Jersey, US and Bangalore, India).

## C) DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

## D) COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the

minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, and in many cases exceeds those minimums in relation to its employees.

## **E) SUPPLY CHAINS**

In order to fulfil its activities, the Organisation's main supply chains include those related to provision of Cloud hosted Microsoft Services and Vendor provided software solutions provided from US owned suppliers.

We understand that the Organisation first-tier suppliers are intermediary traders and there have further contractual relationships with lower-tier suppliers.

## **F) POTENTIAL EXPOSURE**

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## **G) IMPACT OF COVID-19**

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

## **H) STEPS**

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing supplier contracts to include termination powers to action in the event that the supplier is, or is suspected, to be involved in modern slavery;

**I) TRAINING**

The Organisation provides the following induction training to staff to effectively implement its stance on modern slavery.

**J) SLAVERY COMPLIANCE OFFICER**

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval      26<sup>th</sup> April 2023

Signed                      James Jury  
                                    Director

Date                         26<sup>th</sup> April 2023