



Trustco Modern Slavery Statement

1. Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and outlines the steps Trustco has taken to prevent modern slavery and human trafficking in our business and supply chains for the financial year ending 31/03/24.

At Trustco, we are committed to conducting our business ethically and with integrity. We take a zero-tolerance approach to modern slavery in all its forms and expect the same high standards from our suppliers and partners.

2. Our Business Structure

Trustco is a publicly listed company (PLC) operating in the IT infrastructure and services sector. We provide IT infrastructure, consultancy, hybrid cloud services, data backup, and cybersecurity solutions to a diverse client base in the commercial and public sectors.

3. Our Supply Chains

Our supply chains include the procurement of IT hardware, software, cloud services, and cybersecurity solutions. We partner with suppliers and manufacturers globally, with primary sourcing from Europe, North America, and Asia. While many of our key vendors are headquartered in North America or Asia, they often manufacture in Europe to better streamline supply to both the UK and broader European markets. Additionally, we collaborate with various service providers to support our consultancy and infrastructure services.

4. Our Policies in Relation to Modern Slavery

We have implemented the following policies to support our commitment to identifying and mitigating the risks of modern slavery in our operations and supply chain:

- **Anti-Slavery and Human Trafficking Policy:** Establishes our zero-tolerance stance on modern slavery and defines the responsibilities of all employees and suppliers.
- **Supplier Code of Conduct:** Requires all suppliers to adhere to our anti-slavery standards and expectations.
- **Whistleblowing Policy:** Encourages employees to report any concerns regarding modern slavery or human trafficking confidentially.

5. Due Diligence and Risk Assessment

We conduct regular risk assessments to identify and mitigate the risks of modern slavery within our supply chains and business operations. Our due diligence process includes:



- Evaluating new suppliers and conducting risk-based audits on existing suppliers where modern slavery risks may be higher.
- Requiring suppliers to confirm adherence to anti-slavery policies and providing support to meet compliance requirements.
- Immediate review and action, including termination of relationships, if suppliers breach anti-slavery expectations.

6. Measuring Effectiveness

To ensure our efforts are effective in preventing modern slavery, we measure and track the following key performance indicators (KPIs):

- Number of supplier audits completed.
- Training completion rates for employees on anti-slavery awareness.
- Reports of suspected modern slavery and the resolution actions taken.

7. Training

We provide mandatory anti-slavery training for all employees to ensure awareness and understanding of modern slavery risks. Specific training is also provided to employees in procurement and supply chain roles, equipping them to identify and address potential issues in our operations and supplier relationships.

8. Our Commitment and Future Steps

We are committed to reviewing and improving our approach to combatting modern slavery. We will continue to monitor, assess, and enhance our policies, training, and due diligence processes in line with evolving standards and best practices.

Approval

This statement was approved by the Board of Directors of Trustco on 13/11/24 and will be reviewed annually.

Signed:

Tim Cripps

Tim Cripps MD

13/11/2024