

Cobwebb Modern Slavery Policy

Policy Statement

Cobwebb Communications Ltd is committed to a zero-tolerance approach to modern slavery and human trafficking. Although our annual turnover is below the £36 million threshold mandated by the Modern Slavery Act 2015, we voluntarily adopt this policy to support our customers' compliance and to ensure ethical standards within our business and supply chains.

Risk Assessment

As a UK-based organisation, we consider our direct risk of exposure to slavery to be low. We identify our primary area of risk as our external supply chains - specifically suppliers, contractors, and business partners.

Supply Chain & Onboarding

We are committed to ensuring our supply chain reflects our values. To achieve this:

- **New Supplier Onboarding:** We have integrated modern slavery compliance into our onboarding process for all new suppliers, contractors, and business partners.
- **Existing Suppliers:** We acknowledge that not all long-term suppliers have publicly available policies; however, we strive to ensure, where reasonably practicable, that our partners share our commitment to ethical labor practices.
- **Due Diligence:** We perform appropriate due diligence when vetting new partnerships and reserve the right to terminate relationships with any provider found to be in serious breach of human rights standards.

Employee Awareness & Recruitment

We maintain ethical internal hiring practices and ensure all staff understand our expectations:

- **Vetting:** We only engage with reputable recruitment agencies
- **Policy Awareness:** All new employees are made aware of this Modern Slavery Policy, alongside other core company policies, during their initial onboarding.

- **Reporting:** All employees are encouraged to raise concerns about suspicions of modern slavery in any part of our business or supply chain at the earliest possible stage. We ensure that any employee who raises a concern in good faith is supported.

Our Commitment

To the extent that is reasonably practicable, we confirm that:

- No offences relating to slavery or human trafficking have been committed within our own business.
- We have found no evidence of slavery or human trafficking within our examined supply chains.
- We will continue to communicate our zero-tolerance approach to all stakeholders.