

**The GNR Technology Limited Group  
(including QBS Software Limited)  
Modern Slavery and Human Trafficking Statement  
3 August 2018**

## **Introduction**

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the following financial periods:

- For GNR Technology Limited, the 12 months ended 31 December 2017 and the three months ended 31 March 2018; and
- For QBS Software Limited, the year ended 31 March 2018.

The statement sets down the commitment of GNR Technology Limited and QBS Software Limited (together referred to as “the GNR Technology Group” or “the Group”) to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

## **Organisational structure and supply chains**

This statement covers the business activities of the GNR Technology Group which are as follows:

- Providing representation services and fulfilment for leading software publishers and hardware manufacturers;
- The sale and distribution of third party computer software products;
- The design and development of software;
- Technical consultancy services; and
- Conducting computer training programmes.

The group trades with third parties through QBS Software Limited, which is incorporated and resident in England and operates from premises in Wembley, Middlesex and Telford, Shropshire.

Most of the Group’s sales activity is undertaken with customers in the UK, though there is also significant trading from the Group’s UK premises with customers in the European Union and in many other countries in the World.

The Group sources the computer hardware and software products it distributes from over 2,000 active suppliers. Approximately one-third of these products are sourced from UK suppliers, approximately one-third from suppliers in the European Union, and approximately one-third from suppliers in numerous countries in other parts of the World. These suppliers are almost

exclusively computer software publishers, OEM hardware manufacturers, or are themselves distributors of computer hardware and/or software.

The following is the process by which the Group assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking:

- i. The Group undertakes periodic reviews to assess whether particular activities or countries are high risk in relation to modern slavery or human trafficking by applying a methodology which is based around a suppliers' country of operation and their category of supply. If any higher risk suppliers are identified they are subjected to further inquiry and assessment; and
- ii. Where the Group engages a new relationship supplier, there is a supplier take-on process that, amongst other things, includes an assessment of any slavery or human tracking risk; and
- iii. If any supplier is considered to be at risk in relation to possible slavery or human tracking, then the Group will either decline to trade with the supplier or will make further inquiry and or keep the supplier relationship under review.

### **High Risk Activities**

The Group's computer software products are highly technical in nature and their development and distribution by suppliers is considered by the Group to be a low-risk activity in relation to slavery or human tracking risk.

Some of the Group's computer hardware and peripheral/accessory products are manufactured in parts of the World where manufacturing costs are significantly lower than they would be in Europe. However, many of the suppliers are internationally recognised brands. This Group currently considers this part of its business to be a medium-risk activity in relation to slavery or human tracking risk.

Whilst the situation is kept under continuous review, the Group does not currently consider any part of its business to be a high-risk activity in relation to slavery or human tracking risk.

### **Responsibility for Anti-slavery**

Responsibility for the Group's anti-slavery initiatives is as follows:

The Operations Director, Colin Lee is responsible for:

- i. Creating and reviewing policies:

The process by which policies are developed is:

- Reviewing best practice and publications; and

- Seeking professional advice and/or guidance where required.
- ii. Risk assessments:
- The process by which risk is assessed is a process of annual review.
- iii. Due diligence:
- The Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Group's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

## Training

The Group makes a copy of its Anti-Slavery policy available to existing employees and newly-engaged employees. Staff activity is closely managed by the Group's senior management and further guidance in relation to anti-slavery and human trafficking awareness is given on-the-job

## Policies

The Group is committed to ensuring that there is no modern slavery or human trafficking in its business or our supply chains. This Statement affirms its intention to act ethically in its business relationships.

The following policies set down the Group's approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- 2.1 **Whistleblowing policy** - the Group encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Employee Code of Conduct** - The Code of Conduct sets down the actions and behavior expected of employees when representing the Group.
- 2.3 **Corporate Social Responsibility (CSR) Policy** - The Group's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

## Performance indicators

The Group does consider it necessary or appropriate to use specific key

performance indicators to measure how effective it is in ensuring slavery and human trafficking. As stated above, compliance is reviewed by the Operation Director periodically.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as required by law for each of the Group's financial years and additionally as necessary. The Group's board and senior management team endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: G D Stevinson  
Position: Group Chief Executive  
Date: 3 August 2018