



## **Modern slavery statement**

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps that Adaptive Web Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Adaptive Web Ltd has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our business**

Adaptive Web Ltd provide Drupal support and development services to a wide variety of clients, from small businesses to large international charities. We are based in Derby, UK. We are a team of 21, all working from the same office in Derby. We provide all our support and development services directly and do not use any outside contractors to deliver any of these services.

### **Our policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

### **Our suppliers**

Adaptive Web Ltd conduct due diligence on all suppliers before allowing them to become a supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. As part of our contract with all new suppliers, they are required to confirm that no part of their business operations contradicts this policy.

### Training

We regularly conduct training with relevant members of our team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### Measuring performance

In order to measure how effective we are in ensuring that modern slavery and human trafficking is not taking place in our business or supply chains, we are:

- Continuing to develop a system for supply chain verification, in place since November 2016, whereby the organisation evaluates potential suppliers before working with them;
- Conducting a review of our existing supply chains, expected to be completed by March 2018, whereby the organisation evaluates existing suppliers.

### Approval for this statement

This statement was approved by the Managing Director of Adaptive Web Ltd

Name: Dan Frost  
Date: 01/03/2017