



## **VOODOO TECHNOLOGY LTD (T/A/ AS BRIGHT CYBER)**

### **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

#### **Introduction**

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 30 June 2021.

Voodoo Technology Ltd t/a Bright Cyber ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

#### **Organisational structure**

Voodoo Technology Ltd t/a Bright Cyber has business operations in the United Kingdom. We operate in the information and cyber security sector. The nature of our supply chains is as follows: We work with a number of key direct suppliers, who provide us with goods, such as equipment for our operations, and services, such as outsourced business processes, IT software and marketing services. Further, we resell technology, cloud security and professional services from key information security vendors and suppliers as part of our solution offering to our customers.

For more information about the Company, please visit our website: <https://bright-cyber.co.uk/>.

#### **Policies**

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

These include the following:

- **Recruitment and selection policy** - Our recruitment policy includes background checking, which includes as a minimum confirming the legal right to work in the UK and sighting all related documentation.



We conduct background checks for a capability that includes verifying references and previous work history.

- **Supplier code of conduct** - We verify that our major suppliers are compliant with the Modern Slavery Act 2015.
- **Whistleblowing policy** - We encourage employees to be open with their concerns and advise them that they can contact any of the directors of the business if they have any concerns related to the conduct of our business or suppliers, including concerns related to modern slavery and without fear of reprisal.
- **Staff code of conduct** - We are committed to the ethical, fair and professional treatment of all staff. Our staff handbook outlines our expectations and obligations of staff to act in an ethical, legal and professional manner at all times.

The code of conduct makes it clear that we have a zero-tolerance approach to modern slavery.

- **Procurement policy** - We want to make sure that potential suppliers are committed to ensuring that slavery and human trafficking is not taking place within their own supply chains. Our procurement policy and supporting procedures set out controls and checks undertaken to help verify this.'
- **Safeguarding policy** - This policy highlights the potential risks of modern slavery and human trafficking, including how to identify signs of exploitation and how to report concerns.

We make sure our suppliers are aware of our policies and adhere to the same standards.

## Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

## Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:



- Evaluating the slavery and human trafficking risks of each new supplier.

We do not consider that we operate in a high-risk environment because The business operates in this risk level environment because the majority of our supply chain is based in the UK and in low-risk industries such as information and cyber security.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

## **Effectiveness**

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every 36 months.
- We will train our staff about modern slavery issues and increase awareness within the Company.

## **Training our staff**

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high-risk scenarios

The statement was approved by the board of directors.

A handwritten signature in black ink, appearing to read 'M. Pearce', written over a light blue rectangular background.

Murray Pearce, Director  
Voodoo Technology Ltd t/a Bright Cyber  
Date 05/05/2022