

Modern Slavery Policy 2023

Anti-slavery and human trafficking

New Era Technology Global Video Collaboration (GVC) Division

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Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At New Era Technology, we have a zero-tolerance approach to modern slavery. Whilst we are not required by the Modern Slavery Act 2015 (UK) to publicly report the steps we're taking, we are fully committed to preventing slavery and human trafficking in our operation and supply chain.

This statement sets out the actions that we have taken or plan to take to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2023.

Our business

The New Era Technology Global Video Collaboration (GVC) Division operates across the USA, UK, New Zealand, Canada and Hong Kong. We specialise in developing technology solutions that securely connect people, places and information in a rapidly changing digital world.

Offering a range of SaaS based technology solutions, we service education, corporate enterprise and government organisations across the globe.

Our video collaboration portfolio offers a comprehensive turnkey solution, complete with AV design, build, implementation, full support and optimisation. Able+ is an IAM solution, designed to support the complex and ever-changing needs of modern user identities as well as catering for legacy and complex user requirements. Our suite of educational solutions save schools money and time while increasing efficiency and engagement with their community

Our cloud technology solutions, project management and professional services allow New Era professionals to work with customers as a trusted technology adviser. Often a single project leads to a long-lasting partnership where we have the continued privilege of helping our customers deliver valuable technology solutions that improve efficiencies and experiences to their employees' and customers'.

Policy Statement

This policy applies to, and is available to, all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

We are also committed to ensuring there is transparency in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children. We also require our suppliers to hold their own vendors and suppliers to the same high standards.

Internal Policies

New Era Technology GVC Division operate the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. Employees can report concerns to any member of the Senior Leadership team or the Divisional President.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Supply Chain Management

This policy sets out our expectations and commitments in accordance with the Modern Slavery Act 2015 (UK).

We have zero tolerance for slavery and human trafficking in any part of our business, including our supply chains.

We do not carry on business or contract with any suppliers based in any of the countries listed as having the greatest prevalence of modern slavery by the Modern Slavery Index:

(<https://www.globalslaveryindex.org/2018/findings/global-findings/>)

During 2022 we made significant improvements to our supply management including carrying out a risk assessment of our supply chain and starting work on a new supply chain management process. This work will continue into 2023 and will include reviewing all key suppliers and the contracts we hold with them, implementing a new supplier management programme and implementing a new supplier onboarding and offboarding process.

The above activity will include:

- Reviewing & updating our supplier contracts to make explicit reference to slavery and human trafficking.
- Implementing a new Supplier due diligence process. This will include:
 - Assessing risks in the provision of particular services
 - Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
 - Requiring improvements to substandard employment practices

- Sanctioning suppliers that fail to improve their performance in line with our requirements

We will include the requirement that all suppliers attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

We have zero tolerance for slavery and human trafficking in any part of our business, including our supply chains. We have a number of policies in place to ensure all our employees have the right to work and are paid fairly, that we act with integrity and ethically, and that we have effective measures in place to ensure slavery is not present anywhere in our business or supply chain.

As noted above, this includes our Equal Opportunities policy, which encompasses recruitment, promotion, training, performance management and reward. Our principles of fair treatment and respect are also applied to our relationships with customers, suppliers, contractors, shareholders and other stakeholders.

Responsibility for the Policy

The goal of eliminating slavery and human trafficking extends to all New Era employees, vendors and contractors. The Board of Directors of New Era has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

On a day to day basis the Legal department has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any enquiries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training including on the issue of modern slavery in supply chains.

Compliance with the Policy

If you are provided this policy as a part of your employment on boarding process, you must ensure that you read, understand and comply with this policy. Any questions or concerns should be made to your immediate supervisor or human resources team member.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify a member of the senior leadership team or the division president as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are also encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify a member of the senior leadership team or the division president as soon as possible.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any retaliatory treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. If you believe that you have suffered retaliation as a result of reporting or discussing possible modern slavery events, please inform a member of the senior leadership team or the division president immediately.

If the matter is not remedied, and you are an employee, you should raise it formally with your direct supervisor and if necessary with the office of the General Counsel.

Awareness and Training of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action up to and including dismissal. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy. This includes vendors and suppliers.

Measuring how we're performing

At the end of 2023, we will undertake a review to measure how we are performing. Our measurements will include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?

Policy Review

The GVC Division Senior Leadership team review this policy annually and when there are any significant changes to our internal policies.

This policy covers 1st January 2023 to 31st December 2023 and has been approved by the New Era Technology GVC Division President, Dawn Mulholland and by New Era Technology's Board.