

Modern Slavery Act Statement -Revised

Fiscal year ended 31 December 2023

Introduction

The Modern Slavery Act 2015 (the 'Act') requires each business with an annual turnover of over £36m to publish a transparency statement which sets out the steps they have taken to ensure there is no modern slavery in their own business and in their supply chains. This statement is made pursuant to the Act.

We do not tolerate forced, bonded or compulsory labour, human trafficking and other kinds of slavery within our own operations or within our supply chain and we are committed to taking appropriate steps to ensure that everyone who works for Opencast (in any capacity) benefits from a working environment in which their fundamental rights and freedoms are respected.

Our approach to preventing modern slavery forms part of our wider Environmental and Social Governance responsibilities. We adopt procedures that contribute to ensuring modern slavery does not occur in our business or supply chains and we expect organisations with whom we do business to adopt and enforce policies to comply with the relevant legislation.

Organisational Structure and Supply chains

The organisational structure of 'Opencast' comprises Opencast Software Europe Limited incorporated & located in the UK.

Opencast is a technology consultancy founded and based in the UK; from our Headquarters in Byker, Newcastle-upon-Tyne we design, build and run human focused digital solutions for our client base which is predominately UK Public Sector organisations.

Opencast is committed to being a purpose-led business that makes a positive impact on society. We are focused on doing the right thing for everyone, and this includes our people, our clients and our wider communities. We were awarded B Corp status in June 2024.

We partner with largely UK based technology & professional service consultancies to augment and support the services provided by our in-house teams.

Opencast continually assesses risk in relation to modern slavery and human trafficking within our business and supply chain via the application of the policies and procedures detailed in this document. We consider these risks to be low, particularly because of the sector (digital technology consultancy) in which we operate, the limited nature of our supply chains, and the values and policies that guide the actions of our directors, employees, and contractors.

Commitment

Opencast acknowledges its responsibilities under the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking within its own businesses and in its supply chains. Opencast understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.

Opencast has a zero-tolerance policy towards modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships. It will refrain from doing business, and will discontinue current business with any organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

As detailed below, we have a number of procedures in place which we consider to be appropriate to our business and effective in preventing modern slavery from occurring in our business and our supply chains. We continually review the control environment to ensure processes are fit-for-purpose and effective in the detection and prevention of modern slavery.

The Board of Directors and senior leadership are accountable for the governance and oversight of modern slavery risks.

From 2024, Opencast's Risk & Compliance team will be responsible for day-to-day activities and due diligence.

Employment

We treat our employees fairly, lawfully, and professionally, ensuring good working conditions. We are committed to paying our staff the real living wage and do not engage in zero-hours contracts for permanent employees. Our facilities comply with health and safety regulations and meet Disability Confidence (Level 1) standards. All permanent employees receive holiday entitlements above the statutory requirement, along with additional financial, health, and lifestyle benefits.

In line with the UK Government Baseline Personnel Security Standard (BPSS), our organisation is committed to ensuring a safe and compliant workforce, free from any practices related to modern slavery or human trafficking. As part of the recruitment process, we conduct:

- Identity, right-to-work and credit checks,
- Along with criminal record and civil checks for all our people

Additionally, we verify employment history for a minimum of three years to uphold these standards.

These measures reflect our dedication to maintaining a responsible and secure working environment while adhering to the highest ethical and legal requirements.

Opencast employees are offered a competitive remuneration & benefits package. The Company conducts surveys on an anonymous basis to give employees a voice on their individual employment, their department, and the company as appropriate.

We consider and address circumstances where there may be a higher risk of modern slavery. For example, we worked with our office cleaning agencies to ensure that all contracted cleaners are not on zero hour contracts and receive a real living wage.

Employee policies & procedures:

These policies promote honest and ethical business practices and requests compliance with applicable laws and regulations. All directors and employees are required to read and acknowledge the policies, comply with their provisions, and report any suspected violations.

Supply Chain transparency

We source goods and services from reputable suppliers and the nature of the goods and services we procure typically do not demand the types of labour at risk for slavery and human trafficking.

Supplier Agreements:

- Where appropriate, suppliers are subject to legal terms and conditions with Opencast.
- We will discontinue current business with any organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

Improvements planned for 2024:

- All Suppliers will be subject to legal terms and conditions with Opencast.
- Assessment of potential Suppliers will be conducted as part of our Supplier onboarding process and procurement function.
- Suppliers deemed high risk will be monitored and reviewed periodically for Modern Slavery compliance.
- Suppliers will be screened against relevant sanction and denied parties lists which includes human trafficking violations. Opencast will not enter into contracts with organisations under sanctions imposed by the UK, US, UN or EU.

From 2024, Opencast has established the following process to further identify and to mitigate risk:

Supplier Code of Conduct:

This Code sets forth the principles and ethical standards we expect our business partners to comply with throughout our business relationship, including our expectation that business partners to comply with Modern Slavery legislation. Business partners include all Suppliers, contractors, consultants, and agents.

Supporting our People & Suppliers

Training:

- Opencast conducts policy & procedure training for all employees (including temporary workers) at joining. Those who do not comply with requirements are subject to our Disciplinary Policy.
- Opencast encourages use of its Whistleblowing policy for employees to report any concerns regarding modern slavery and will investigate any complaints thoroughly. Management takes all reports seriously and performs timely investigations to determine necessary actions in line with the Opencast Whistleblowing Policy.

Improvements planned for 2024:

- Opencast will provide Modern Slavery Employee Awareness Training to all employees on an annual basis.
- Annual certification of Opencast policy & procedure by all employees will be required.
- Opencast will establish an anonymous Whistleblowing Hotline available for all employees report any concerns regarding modern slavery.
- We expect our Suppliers to communicate the principles in the Supplier Code of conduct, to their employees and third-party partners through training, policy, and other messaging.

Due Diligence

From 2024, the following procedures are being performed by our Risk & Compliance team:

- Detailed regulatory compliance & ESG reviews will be performed before entering into Supplier agreements.
- Suppliers deemed to be at high-risk of non-compliance will be subject to an annual review.
- Annual review of internal policies to ensure alignment with this statement.

Assessment of Effectiveness

To ensure effectiveness in combatting modern slavery, Opencast maintains an accurate supplier list including contact details. We ensure action is taken in response to reports of modern slavery in our supply chains and any complaints made via the whistleblowing policy are responded to in accordance with the policy.

Opencast has not received any reports or complaints about being involved in activities covered by the Modern Slavery Act, during the year ended 31st December 2023 (nor at any other time, to date). Should Opencast become aware of any policy violations or issues related to slavery or human trafficking, we will ensure that appropriate measures are taken, which may include reporting this information to authorities and terminating our relationship with the supplier.

This statement is published in compliance with the United Kingdom Modern Slavery Act of 2015. The Board of Directors and management of Opencast are fully committed to sustaining a work environment and supply chain free of human trafficking and modern slavery of any kind.

This statement is applicable to Opencast Software Europe Limited and was approved for the fiscal year ending 31st December 2023, by the Board of Directors on 4th September 2024. It will be reviewed and approved annually by senior leadership and the Board of Directors.

Tom Lawson
CEO