

## Orange Cyberdefense UK – Modern Slavery & Human Trafficking Statement

### 1. 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 Orange Cyberdefense, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement.

This statement sets out the actions that we have taken 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 2020/2021.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### 2. Our Business and where we operate

Orange Cyberdefense is a cybersecurity business unit of the Orange Group. We strive to build a safer digital society are a threat research and intelligence-driven security provider offering unparalleled access to current and emerging threats.

Orange Cyberdefense retains a 25+ year track record in information security, 250+ researchers and analysts 16 SOCs, 10 Cyber SOCs and 4 CERTs distributed across the world and sales and services support in 160 countries. We offer global protection with local expertise and support our customers throughout the entire threat lifecycle.

### 3. Our policies and procedures

We operate several policies and procedures which reflect our commitment to acting properly in all our business relationships and to implementing and enforcing effective systems and controls. They apply to all our employees and to anyone engaged on a temporary basis.

Our key policies and procedures which contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chain include our:

- Bullying & harassment policy – which is designed to help ensure that all our staff and anyone that we fund is treated with both dignity and respect.
- Risk management policy – which is designed to keep all our activities in line with all applicable laws, regulations and codes of governance (including in relation to slavery and human trafficking).
- Health, safety and environment policy – a key aim of which is to ensure the wellbeing of all our employees and anyone else who may be affected by our activities.

- HR procedures – we check that all our staff have appropriate right to work documents and ensure that they are paid fairly and enjoy a competitive remuneration package.
- Procurement policy – which sets out several factors to be considered when selecting our suppliers including developing responsible relationships with our supplier. This in turn involves considerations of supplier reputation and compliance with laws and ethical procedures.
- Commitment to Responsible Procurement Procedure -which sets out our commitment to international standards including in particular the Universal Declaration of Human Rights, International Labour Organisation (ILO)
- Fraud and corruption policy – which reminds our people to take account of any improper or suspicious behaviour or situations and to report and deal with the risk of fraud and corruption.
- Whistleblowing policy – which provides guidance on how to report suspected dangers or wrongdoing in the workplace.
- Orange Cyberdefense UK Equal Opportunities policy – which reminds our people that Cyberdefense is committed to providing equal opportunities in employment and to avoid unlawful discrimination in employment and against its customers. This policy is intended to assist the Company to put this commitment into practice.

Our policies are monitored by a relevant policy owner within our business and reviewed at least every three years and as legislation changes. We will continue to review our policies to ensure that they are effective and appropriate, considering a range of risks, including slavery and human trafficking.

#### **4. Supplier due diligence**

We have looked at all our suppliers and assessed our key suppliers to ensure that they have appropriate policies in place to minimise the risk of slavery and human trafficking in their business. Based on our review, we are satisfied that our key suppliers have appropriate policies in place.

We also carry out due diligence checks on material suppliers and routinely monitor their compliance with applicable law (including in relation to slavery and human trafficking) as well as certain 'key performance indicators' such as training and paying the London Living Wage or the National Living Wage.

Due diligence and monitoring are ongoing and under review to improve supplier vetting and to further minimise a range of risks, including slavery and human trafficking. This is being led by our procurement team, assisted by our legal team. Our procurement team is also looking to foster long-term relationships with suppliers, through which policies aimed at minimising a range of risks (including the risk of slavery and human trafficking) can be advanced.

#### **5. Customers, suppliers and other people not employed by the Company**

The Company will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the Company.

Employees should report any bullying or harassment by customers, suppliers, visitors or others to their manager who will take appropriate action.

#### **6. Training and Communication**

We try to ensure that adequate information and training is provided to all our employees, contractors or visitors on all relevant matters. Here are some examples of the information and training we provide:

- All new joiners attend an induction session which includes information and training on our policies.
- Our managers are provided with training and are assisted by our HR team in HR related matters including in relation to recruitment, remuneration and employee wellbeing.

- Our procurement team, assisted by our legal team, routinely seek out information and training to help identify and address risks in both our organisation and supply chain (including in relation to slavery and human trafficking) and will continue to do so.
- All employees are aware of the Act and the drivers of modern slavery, as well as the possible indicators, this statement has been shared with all employees through our internal communication channels. It is also available on our website ([www.orange cyberdefense.com](http://www.orange cyberdefense.com)).

## 7. Further Steps

- We will continue to strengthen our approach to managing the risk of modern day slavery within our business and supply chains and:
- Continue to roll out training to procurement teams and working alongside our suppliers to ensure that we are up to date with latest procedures.
- Increase audits of our high sustainability risk suppliers.
- Maintain effective and continued focus on employee awareness of how we expect employees to conduct business responsibly, focusing on treating people fairly and equally, acting lawfully and the process involved to raise ethical concerns.

## Board Approval

This statement is made pursuant to section 54(1) of the Act, has been approved by the Board of Director Orange cyberdefense UK and will be updated annually in line with the Modern Slavery Act's reporting requirements.

Signed:   
[Clive Hamilton \(Jul 30, 2020 17:42 GMT+1\)](#)

Clive Hamilton  
**UK Managing Director**

Last Updated: July 2020

# OCD Modern Slavery & Human Trafficking Statement

Final Audit Report

2020-07-30

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