Anti-Slavery Declaration 2022

This statement is made pursuant to S54 of the Modern Slavery Act 2015 and sets out steps Reconome has taken and continues to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Organization structure and supply chains

Reconome Technologies Ltd. is a sustainable recycler and refurbisher of electronic devices and IT equipment, established in 2018. Reconome's purpose is to ensure that every piece of hardware that is useful and valuable is given a second productive life with a new owner.
Reconome has close partnerships with some of the UK's leading businesses.

The hardware supply chain is complex and global in nature. Products include but limited to:

- Laptops
- Monitors
- Smartphones & Tablets
- PCs
- Networking & Server Equipment

There can be several levels of supplier between the end products provided by manufacturers and the raw materials that make up the development of components and elements which are used in the manufacturing process.

Risk and Compliance

Reconome is firmly committed to the Modern Slavery Act, and all staff members are made aware of the criminal nature of any activity connected with modern slavery. While we do not yet meet the criteria for mandatory anti-slavery policy under the act, we nonetheless take all possible measures to reduce any risk of activities that may be connected with modern slavery within our systems of operations.

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

- Anti-slavery policy. This policy sets out Tech21's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help
- Supplier Code of Conduct. This policy was made to ensure that all of our business partners, suppliers, and manufacturers meet our basic expectations of doing business related to legal requirements, ethical practices, human rights, and environmental management

Due Diligence

Although we are committed to Value for Money principles, we ensure that every purchase and business relationship does not compromise our compliance with the act or our company's ethical standards, and we have zero tolerance for slavery and human trafficking.

We work only with suppliers who comply with our Equality and Diversity Strategy, which includes non-discrimination in employment, and we are proactive in seeking clarification of the controls in place with higher risk suppliers, such as contractors and sub-contractors, to protect against modern slavery or people trafficking.

The Company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54 (4) of the Modern Slavery Act 2015, the Company continues to ensure that modern slavery is not taking place through the following processes:

- Request new suppliers to confirm their compliance with the Modern Slavery Act 2015
- Monitor new supplier authorisation process to identify any suppliers who are unwilling to confirm their compliance with the Modern Slavery Act 2015
- Reserved the right to terminate supplier contracts in the even that a supplier is involved in Modern Slavery
- Requested to our suppliers compliance of our Code of Conduct
- Ensure that any new employees involved in the procurement process undergo training

Risk and Compliance

We have undertaken risk assessments to identify key areas of risk and have procedures in place to mitigate these risks:

- All employees, whether permanent or temporary, are subject to appropriate checks on recruitment, including DBS checks, as necessary, and proof of eligibility to work in the United Kingdom.
- Specific training is given to front-line staff who may identify evidence of modern slavery or human trafficking in the community.
- Screening suppliers and contractors to ensure they comply with legal requirements and have their own Modern Slavery Statement in place.

Training

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Employees are encouraged to identify and report any potential breaches of our anti-slavery, human rights and child labour policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

Reporting

Reconome has robust internal procedures and guidance for employees to report any suspected breaches of the Modern Slavery Act 2015. Members of the public can contact Reconome customer services and/or report and get advice and guidance from Modern Slavery Helpline 0800 0121 700.

- The Modern Slavery Helpline
- National Crime Agency (NCA)

This policy will be communicated to all staff, contractors, and suppliers.

Nicholas Rawkins, Chief Executive Officer
Date: 04.01.2022