

Modern Slavery Act Statement

Introduction

This statement sets out IDC UK Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps which are aimed at ensuring that there is no slavery or human trafficking in its business and supply chains. IDC UK Limited recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing modern slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Our Business

IDC is a wholly-owned subsidiary of International Data Group (IDG). It is the premier global provider of market intelligence, advisory services, and events for the information technology, telecommunications, and consumer technology markets. IDC offers global, regional, and local expertise on technology and industry opportunities and trends in over 110 countries, including Western Europe, Central and Eastern Europe.

In the UK, IDC offers the world's leading media, data and marketing services which inform and engage the most influential technology decision makers. IDC UK Limited is committed to the highest ethical standards within both its business and supply chain and expects the same standards from its suppliers.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The HR Manager and EMEA HR Vice President are responsible for investigation in relation to known or suspected instances of modern slavery and human trafficking. A full copy of this policy and a copy of the Modern Slavery Act 2015 is accessible to all our employees.
- 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 on it and the issue of modern slavery in supply chains.

Relevant Policies

The organisation operates the following policies which describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Employee Concerns (Whistleblowing) Policy:** The organisation encourages all its stakeholders to report any concerns related to the direct activities, or the supply chains of the organisation. This can include any circumstances that may give rise to an

enhanced risk of slavery or human trafficking. The organisation's policy is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report any activities associated to modern slavery and human trafficking by contacting their immediate line manager, the human resources manager or confidentially to the Western European Chief Operating Officer (statutory director of IDC UK).

- **Employee Code of Conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier Code of Conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. All suppliers are subject to our standard questionnaire relating to modern slavery and human trafficking. However, serious violations of the organisation's supplier code of conduct will lead to prompt action taken in accordance with our moral and legal obligations.
- **Recruitment Policy:** The organisation mainly employs people on a permanent contractual basis, fixed or short-term contract, interns or contractors. IDC uses reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Prior to commencement of employment, all employees are subject to right to work, residency and employment checks in accordance with the immigration Asylum and Nationality Act 2006. The recruitment Policy is compliant with all EU and UK legislation, including the minimum wage and therefore is not at risk of slavery and human trafficking.
- **Anti-Bribery Policy:** The organisation's Anti Bribery Policy aims to prevent any form of bribery being committed within the organisation and by any stakeholders associated with its business. The IDC board of directors fosters a culture of integrity where bribery is unacceptable. The policy is communicated to all employees and forms part of the induction programme.

Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier in accordance with the supply chain selection process;
- conducting a supplier due diligence questionnaire which has a greater degree of focus on slavery and human trafficking where general risks are identified;

Communication and Awareness

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 who work for us, and regular training will be provided as necessary.

It is IDC's commitment that 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 as appropriate thereafter.

Breach

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Approval

This statement for the financial year ending 31 December 2019 is made by IDC UK Limited (IDC UK Limited) in accordance with Section 54(1) of the Modern Slavery Act 2015 ("the Act"). IDC will review and update it annually.

Director's signature:



Robert White
Director, IDC UK Limited