



Modern Slavery Act Transparency Statement

Opening Statement from Senior Management

High Point Solutions Limited is dedicated to preventing modern slavery and human trafficking from taking place within its business and supply chain and we place the same expectation on our suppliers.

Modern Slavery Policy Statement

This policy applies 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, agents, contractors and suppliers.

High Point Solutions, Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Structure and Supply Chains

High Point Solutions, Ltd. Is a limited company registered in the UK (England and Wales) within the IT sector. The company is part of group companies with parent company in New Jersey, USA and employs 55 people in the UK. The following weblink provides more information regarding the nature of our business www.highpoint.com

The nature of our business requires that we work in conjunction with a range of direct suppliers and distributors within the IT sector.

Policies Relating to Slavery and Human Trafficking

The following policies exist within our organisation which demonstrate our opposition to modern slavery:

- UN Global compact Response 2023
- High Point Solutions' Guide to Ethical Business Conduct 2023

We ensure our suppliers are aware of our policies and encourage them to adopt the same high standards. We can provide copies of our policies if required.

Due Diligence Processes Relating to Slavery and Human Trafficking

As part of our efforts to monitor, manage and reduce the risk of slavery and human trafficking occurring within our business or supply chains, we are committed to the following procedures:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.





- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

Our processes aim to:

- Identify, monitor and manage areas of potential risk in our business and supply chains
- Scrutinise any identified areas of risk within our business and supply chains
- Adopt a zero-tolerance approach to slavery and human trafficking throughout the organisation and our supply chains
- Provide support and protection from detriment or disadvantage to any person who, in the public interest, raises genuine concerns amounting to a protected disclosure.

Risk and Compliance

Our organisation regularly evaluates the nature and extent to which our business and our supply chains are exposed to the risk of modern slavery occurring. The following list of risk management activities and/or procedures demonstrates our commitment to compliance:

- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Using our risk-based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

We do not consider that we operate in high-risk sectors or locations because modern forms of slavery are not prevalent in the countries.

Where we have identified a potential risk, we prioritise any risks and take appropriate action to put remedial measures in place.

We ensure our suppliers are aware of our policies and encourage them to adopt our high standards. We adopt a zero-tolerance approach to slavery and human trafficking throughout the organisation which extends to our supply chains. Upon discovery of a breach of our policies relating to slavery and human trafficking we will terminate any relationship with the relevant supplier with immediate effect.

Success and Effectiveness Of Our Processes

We have reviewed our key performance indicators. As a result we aim for:



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- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.

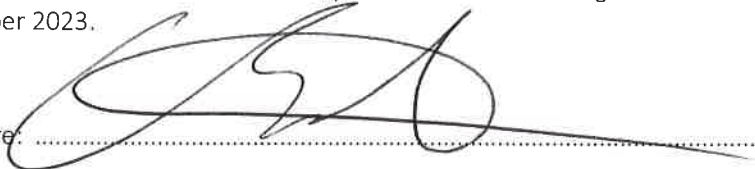
Training

We ensure all employees are aware of the risks of modern slavery and human trafficking in our business and supply chains. We provide advice and guidance to enable our employees to identify and report any potential breaches of the organisations anti-slavery and human trafficking policies.

Further Actions, Approval and Endorsement

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we constantly take steps to tackle slavery and human trafficking. We are committed to take actions to combat slavery and human trafficking.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes High Point Solutions Limited's slavery and human trafficking statement for the financial year ending 31 December 2023.

Signature: 

Mr Michael Mendiburu, President and CEO

Signature: 

Mr Thomas Mendiburu, Co-Founder

Date: 9/14/2023