



Modern Slavery Human Trafficking Policy

Introduction, from the CEO, Stuart McLean

Slavery and any form of human trafficking is a widespread concern in our society. Zonal is heavily committed to taking all necessary steps to ensure our policies and practices help combat these global issues. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

We have updated our company policies and procedures to specifically address these issues and provide staff training where necessary. Both steps reinforce our approach of zero-tolerance towards modern day slavery and human trafficking. Staff are expected to report any concerns and our management team are expected to act upon them.

Going forward we will devise further training for our employees and endeavour to raise awareness within our supply chains on how to recognise and report suspected cases of slavery and human trafficking.

This statement sets out the steps that *Zonal Retail Data Systems Limited* has taken during the financial period 1st July 2019 to 31st December 2020 to ensure that modern slavery and human trafficking is not occurring in our organisation or in our supply chains.

Stuart McLean

Organisational structure and activities

Zonal is the UK market leader for EPOS systems in the UK, providing individually tailored, world class technological solutions to more than 16,000 businesses within the hospitality sector.

Trading for over 40 years, the Head Office is situated at Tanfield, Edinburgh and the business employs over 500 people, the majority of whom are full-time, permanent staff.

Supply chain structure and activities

Our supply chain includes the sourcing of raw materials principally related to the production of our specialised hardware.

Our Policies on Slavery and Human Trafficking

Our policy is 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.

Our Processes relating to Slavery and Human Trafficking and Due diligence

As part of our initiative to identify and mitigate risk –

- Where viable, we run each subsidiary or business premise in the same way to ensure optimum control of the work environment;
- We limit the geographical scope of our premises to ensure optimum supervision of the use of our properties;
- Where possible we build long standing relationships with local suppliers and customers and make clear our expectations of business behaviour;
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking

policies and processes. We expect each entity to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us to have a direct relationship with all suppliers in the chain;

- Employees will only be selected with a legal right to work in the UK and documentation is required to verify this;
- Employment is freely chosen, there is no forced, bonded or involuntary prison labour or recruitment of child labour; and
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Supplier Adherence to our Policy

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and all of our contractors comply with our values. The Directors are responsible for compliance in their respective departments and for their own supplier relationships.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff.

Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of HR Audit on all employees and contractors on an annual basis;
- Use of labour monitoring and payroll systems;
- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the financial period ending 31 December 2020.