

# Modern Slavery Act Transparency Statement 2022

# Preface

By Rob Dance, CEO

Technology is redefining the way the world works, not only does it present opportunities for human advancement, it also provides the chance to create a fairer, more inclusive, better world. In harnessing the power of human ingenuity and the promise of technology we can drive positive impact and create a more equal, sustainable global community.

As an organisation we must, and do, place the impact for good at the forefront of how we operate. At ROCK we're guided by the mission to have a positive impact on our clients, our people and the world. Enshrining human rights in how we operate, and in our every interaction, encouraging our partners to do the same is critical to being an ethical, responsible business.

Our commitment to the protection of human rights is intrinsic to our True North values, and within this of course our obligation to eliminate human trafficking and slavery<sup>1</sup>, in both our business operations and our supply chain. At ROCK we're proud to place respect for individuals, and their rights, at the very heart of how

we operate: fostering an environment in which any person who may have concerns around unethical behaviour, at any stage of our operations, to speak up free of fear. We have then, put in place policies, processes and procedures to empower this, technology-enabled, approach.

In consideration of the sector we work within, and the risk assessments we have conducted to date, we are confident that the risk of slavery and human trafficking is minimal. However, like every organisation across the world we cannot be complacent, and thus we continue to review how we can improve and respond to changing circumstances. Focused on mindfully selecting our suppliers, particularly in higher-risk sectors and countries, we are determined to contribute to the elimination of slavery and human trafficking, both in the United Kingdom and the world.

It is with this perspective in mind that we publish our 2022 Modern Slavery Act Transparency Statement.



This statement sets out the steps ROCK is taking to ensure that slavery and human trafficking are not taking place in any of our supply chains or in any part of our own business.

This statement is made by ROCK in accordance with the requirements of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

<sup>1</sup> In this statement, when we refer to 'slavery and human trafficking,' this includes modern slavery, servitude, forced or compulsory labour and human trafficking, as each of these terms is explained or defined in the Modern Slavery Act 2015.

# ROCK's global business



Rock are global consultants, leaders in digital, cloud and security. Our unparalleled ecosystem of experience and expertise empowers us to operate across more than 40 sectors, offering services in Strategy and Consulting, Interactive, Technology and Operations. Our success is driven by our exceptional people, giants of the technical and commercial industry who deliver on the promise of human ingenuity and technology every day: working with

our clients across the world to solve their technology problems; evolving capabilities and enabling definitive, enduring and significant organisational improvements. We embrace the power of change and innovation to create shared value and success. Disruptive, innovative and resolute we're guided by our True North Values to make a difference: to do the right things by our clients, our people and the world.

# Our Commitment to human rights and responsible business

ROCK is committed to supporting and respecting internationally proclaimed human rights, unswerving in our support for the United Nation's Sustainable Development Goals, conducting our business responsibly, legally and ethically.

Our culture is shaped by our True North values, our mission to make a positive impact on our people, our clients and our communities. Our respect for each other is integral to our obligation to contribute to the elimination of slavery and human trafficking.

We expect all our people to treat each other, and those we deal with, respectfully and with dignity. We do not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behaviour, bullying or harassment of any kind.

At ROCK we actively encourage our team to raise ethical and legal concerns, including concerns surrounding human rights issues,

and we make multiple channels available for them to do so – including anonymously, where legally permitted.

We have a zero-tolerance approach for retaliation against anyone who speaks up, or raises concerns in good faith, regardless of whether these prove to be founded or unfounded. We investigate any potential human rights breach we may become aware of, seeking to appropriately remedy, mitigate or report those breaches as required.

Our employees are expressly prohibited from engaging in, or supporting human trafficking, forced labour and child labour in connection with ROCK's activities, including in our supply chains. We

are guided by the aim to conduct ourselves responsibly in all that we do, every day, and in our every interaction – with each other, our clients, stakeholders, and the communities in which we work and live.

Our support and respect for human rights, which includes helping to eliminate slavery and human trafficking wherever this may occur, extends across and throughout our global reach, we continue to review and assess our own practices as part of our wider risk management processes, and are consistent within our commitments to making a positive impact, worldwide.

# Our Suppliers

## **Our supplier standards of conduct**

Holistically, the relationship between ROCK and our suppliers is a critical component of our support for human rights. We require all our suppliers to assess their business and supply chains, and confirmation of legal compliance is mandatory.

We seek to encourage a culture of transparency within our supply chains, all of ROCK's suppliers sharing our commitment to ensuring the elimination of slavery, forced labour or servitude, child labour and human trafficking.

## **Our Supply Chain Due Diligence and Monitoring Processes:**

### **Onboarding checks**

Our onboarding checks for all ROCK suppliers follow robust processes to assess human rights, ethical and environmental risks when sourcing suppliers. New ROCK suppliers in the UK

must provide detailed information about their human rights policies, processes and legal compliance, including the prevention of slavery and human trafficking within their own organisation and supply chains.

### **Unremitting monitoring**

We recognise the concrete value in an open and transparent relationship with our key suppliers, no single business can tackle the problem of human rights alone, and together we can make a far greater difference than we ever could alone.

We conduct continuous monitoring of our suppliers, and their sectors, assessing them against six key indicators: child labour, fair pay, forced labour, migrant workers, modern slavery, trafficking of persons.

# Living wage



ROCK is an accredited 'real Living Wage' employer. We're passionate about doing the right thing by our staff, our clients and our communities. We're unwavering in our belief that all employees deserve a wage which, at the very least, meets their everyday needs: one that they, and their families, can live on.

We are committed to driving and supporting the adoption of living wages across the UK and globally, requiring all of our suppliers to pay the real Living Wage to their UK employees providing services to us, and before we engage any new ROCK suppliers we take steps to verify that they meet this standard.

# Advocacy on Slavery and Human Trafficking

**Empowering our people: We ensure all of our team are made aware of, and are signatories of, our modern slavery policy, committed to promoting a workplace and a world that is free from bullying, harassment or discrimination.**

## **Our guiding commitments:**

- | An open, inclusive, supportive workplace culture, free of harassment, bullying and discrimination.
- | Recruitment, selection, and assessment is based on skills and competency according to the specific role, appointments are transparent.
- | We proactively adjust and adapt in the workplace as required, helping our people and our business to thrive.
- | To break down the stigma surrounding mental health, encouraging and supporting resiliency.
- | Encourage a culture in which each person is valued for who they are, where all individual differences and contributions are recognised and celebrated.
- | Understand that presenting equal opportunities for all is not the same as treating everybody fairly, and that approaching challenges with fairness can result in more equal outcomes.
- | Regularly review all employment practices and procedures to make sure they're fair.
- | Work with community and voluntary groups to advance equality and directly tackle discrimination in society and the wider world.
- | Our CSR committee will dedicate their time to improving our workplace, our communities and the world: volunteering, fundraising and shedding light on diversity and inclusion.
- | Continual improvement. ROCK's culture is built around continual improvement. Diversity, equity and inclusion are no exception.

## **Advocacy within or ecosystem**

ROCK is committed to advocating awareness of slavery and human trafficking within our global ecosystem of suppliers, encouraging collaboration and the promotion of best practices to address potential risks.

We also continue to look for opportunities to lead on the development of new technological capabilities in this field to support our clients, and to collaborate with other leading organisations, agencies, non-profits and stakeholders.

# Looking ahead



We're committed to building, and contributing to, an environment that encourages respect and diversity: we believe in creating and accelerating fair outcomes for all. Always.

We continue to review our human rights efforts, as well as best practices in the marketplace, to understand how we can further strengthen our commitment to ensure slavery and human trafficking are not taking place within our organisation or our supply chains.

Diversity, equity, and inclusion are crucial to ROCK, imperative to encourage, and unlock, innovation, offering a wider scope of worldviews, perspectives, and approaches to the problems that we, our clients, and our planet face.

Operating with integrity in our every action is an integral part of ROCK's mission and diversity makes us stronger. Every one of our team members brings idiosyncratic value streams, we recognise the more diverse we are, the more we have to offer.

We all have a duty to eliminate slavery and human trafficking, and we remain steadfast in our commitment to contribute to this. United, we can change the world for the better.

The board of directors of ROCK has approved this statement to be signed on its behalf by Rob Dance, CEO, at its board meeting on 2 January 2022, and the information in this statement is accurate as at that date. Signed for and on behalf of ROCK.

**Rob Dance, Founder & CEO**



**ROCK are global consultants, leaders in digital, cloud and security. Our unparalleled ecosystem of experience and expertise empowers us to operate across more than 40 sectors, offering services in Strategy and Consulting, Interactive, Technology and Operations.**

Our success is driven by our exceptional people, giants of the technical and commercial industry who deliver on the promise of human ingenuity and technology every day.

We are guided by our mission to have a transformative impact on our clients and abide by our True North values – our unwavering commitment to do the right thing by our clients, our people, and the planet whilst navigating pathways in the digital age and beyond.

Visit  
[www.rock.co.uk](http://www.rock.co.uk)  
to find out more

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