

## **Introduction**

This statement is made according to Section 54 of the UK Modern Slavery Act 2015. The information in this statement details the policies and procedures FS.COM have taken to ensure that modern slavery, human trafficking and child labor is not taking place in any part of our business or supply chains. The UK Modern Slavery Act of 2015 requires companies in the UK to publish this document to show the processes and measures put in place to eliminate and reduce modern day slavery.

Modern slavery is an international crime and a morally reprehensible act that deprives a person liberty and dignity for another person's gain. It is a real problem affecting an estimated 40.3 million people around the world, including developed countries. It involves the trafficking and slavery of vulnerable individuals who are being kept and exploited in various forms of slavery. Vulnerable people who already live in the UK can also be affected. It is a growing global issue that must be tackled as every company is at risk of being involved in this crime. This crime can happen through the business its self and its supply chains.

At FS.COM, we have many strategies in place to combat this crime. We do not accept any approach to modern slavery and human trafficking in our operation and supply chain. This statement sets out the procedure and steps we have taken to understand all potential modern slavery risks related to our business and to implement steps to prevent slavery and human trafficking during the financial year 2018.

## **Our Business and Supply Chains**

At FS.COM we provide leading communication systems integrators and optical solutions. We are dedicated to helping build, connect, protect and optimize the optical infrastructure from home to businesses and more. We are an online based company and sell data network, fibre products all around the world. Our warehouses are based in America, China and Germany which give us access to the American (Western) market, European and Eastern markets. Originally, we provided fibreoptic capable products in china where our head office is based and now we have expanded globally. As well as selling goods we also provide consultancy services, repair and maintenance, and customer services. In china, we have special research and development centres where our products are tested with great focus on quality control and product functions.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We have not been made aware of any charges of human trafficking or slavery activities against any of our suppliers. However, if we were, then we would act immediately against the supplier and report it to the authorities.

## **Policies**

FS.COM operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy. We encourage all employees, customers and suppliers to report any concerns about misconduct, unfair treatment, illegal activity and other related matters without fear of retaliation.
- **Code of Conduct**. Our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- Equal Opportunities Policy. Employees can be assured our work environment is inclusive and everyone is treated with respect. The Equality Act 2010 makes it unlawful to discriminate against people at work on a wide range of grounds such as age, disability, gender, marriage and civil partnership, and sexual orientation. We adopt a zero-tolerance approach and acts of discrimination, harassment, bullying or victimization are not tolerated and can lead to disciplinarys or even dismissal.
- Human Rights Policy. Employees can be assured they will be treated in accordance to the Human Rights Act. The Human Rights Act 1998 prohibits discrimination on a wide range of grounds such as of ethnicity, sex, race, colour, language, and religion. This means everyone has equal access to the same human rights which FS.COM strongly believes in. Our employees are entitled to fair working conditions and this includes, for example, appropriate working times and breaks, holiday entitlements and access to health and safety training.
- **Corporate Social Responsibility (CSR) Policy**. This policy refers to our responsibility towards the community, environment and workplace and how FS.COM goes beyond to give back to the community, protect our environment and promote human rights.

## **Supplier Due Diligence**

FS.COM conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to confirm that:

- They don't use any form of forced, compulsory or slave labour



- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

## **Awareness**

FS.COM has raised awareness of modern slavery issues by putting up posters across our facilities and sending emails to our staff raising awareness which explains our commitment in fighting against modern slavery and how modern slavery/ human trafficking can be identified and reported.

## **Training**

In addition to the awareness programme, FS.COM are committed to employee training to ensure they are knowledgeable about relevant areas regarding modern slavery and human trafficking. We want our employees to be able to recognise misconduct in the work place or within supply chains. We also want our employees to understand the risks of bribery, fraud and corruption and bring this to our attention if this occurs, so we can eliminate any inappropriate conduct. Our intensive training will provide our employees the skills to handle such situations.

We will also provide our employees with training on identifying modern slavery via e-learning courses which will cover

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps FS.COM will take if a supplier fails to implement anti-slavery policies or controls
- A confirmation from employees that they will abide by FS.COM anti-slavery policy



## **Our Performance**

FS.COM is in the process of

- Requiring staff to complete training on modern slavery
- Developing a system for supply chain verification
- Reviewing our existing supply chains
- Checking that our employees are all being paid fairly and not working excessive hours
- Making sure our facilities are safe to work in.

## **Plans for 2018/19 Approval**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and has been approved by the board of FS.COM for the financial year 2018.

Wei Xiang

Fiberstore Ltd - General Manager

Date:

A handwritten signature in black ink that reads 'Wei Xiang'.

7/16/2018