

# ANTI-SLAVERY, HUMAN TRAFFICKING AND LABOUR STANDARDS POLICY

**DATE OF PUBLICATION: 30 JANUARY 2024**

This policy does not form part of any employee's contract and the Company may amend it at any time.

This policy covers all employees (including full-time, part-time and fixed term employees), consultants, contractors and casual and agency staff.

It is the Company's policy to do everything it reasonably can to tackle modern slavery and to act ethically and with integrity in all its business dealings and relationships.

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for the Company.

## **What is modern slavery?**

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

## **What is the Company's approach to modern slavery and labour standards?**

The Company is committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or in its supply chains.

The Company expects the same high standards from all of its contractors, suppliers and other business partners. The Company expects its suppliers will hold their own suppliers to the same high standards.

The Company complies fully with applicable human rights legislation in the countries in which it operates, which includes upholding freedom of association and the right to collective bargaining, equal remuneration, minimum living wages, prohibition of child labour and forced labour and protection against discrimination. The Company has an Equality, Diversity and Inclusion Policy available on its website.

## **Responsibility for the policy**

The board of directors of the Company, assisted by its ESG Committee, has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations.

The legal team has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Officer.

## **Compliance with the policy**

The Company's zero tolerance to modern slavery is communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and is reinforced as appropriate thereafter.

The Company seeks to promote a working environment where employees are treated with respect, dignity and consideration.

## Raising concerns

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur, in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with the Company's Speaking Up Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally or the working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, please raise it with your manager as soon as possible.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the Company's business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, treats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager or the Speaking Up Officer immediately. If the matter is not remedied and you are an employee, you should raise it formally using the Company's Grievance Procedure.

## Breaches of this policy

Any reported breach of this policy will be investigated by the Company who will take any such reported breaches seriously and take appropriate action to ensure compliance with this policy.

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

Signed:  .....

**Greg Smith, Director and CEO of IP Group plc**

**Date: 30 January 2024**