



Modern Slavery

Company Confidential

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1.0 Purpose & Scope

- 1.1** Modern slavery is a crime and a 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.
- 1.2** Intelling Group (the Group) acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. As a result, the Group requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.
- 1.3** All employees are covered by this policy, including those who are permanent and temporary, and any associated third parties such as agency workers, casual workers and seconded employees.
- 1.4** The list of applicable employees is non-exhaustive, and it is the responsibility of the Directors and Management of the Group to ensure that all employees are aware of and understand this document.
- 1.5** This policy interacts with the Whistleblowing policy.

2.0 Organisational Structure

- 2.1** The Group's Head Office is based in Manchester; however, we have sites across Belfast, Burnley and South Africa.
- 2.2** The labour supplied to the Group in pursuance of its operation is carried out in Manchester, Belfast, Burnley & South Africa.

3.0 Definitions

- 3.1** The Group considers that modern slavery encompasses:
- Human trafficking
 - Forced work, through mental or physical threat
 - Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
 - Being dehumanised, treated as a commodity or being bought or sold as property
 - Being physically constrained or to have restriction placed on freedom of movement

4.0 Commitment

- 4.1** The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.
- 4.2** No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking.
- 4.3** The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in Belfast, Burnley, Manchester & South Africa.

5.0 Potential Exposure

- 5.1** In general, the Group considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

6.0 Controls

- 6.1** The Group carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.
- 6.2** The Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.
- 6.3** In accordance with section 54 (4) of the Modern Slavery Act 2015, the Group has taken the following steps to ensure that modern slavery is not taking place:
- Review of our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
 - measures in place to identify and assess the potential risks in its supply chains including due diligence
 - undertaking impact assessments of its services upon potential instances of slavery
 - any actions taken to embed a zero-tolerance policy towards modern slavery

7.0 Slavery Compliance Officer

- 7.1** The Group has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Group obligations in this regard.

8.0 Staff Understanding

- 8.1** All employees within policy scope should be trained on the issue and must ensure that they read and understand this document in its entirety. If there should be any misunderstanding, it is the responsibility of the employee to ask an appropriate colleague to explain.

9.0 Equal Opportunities

- 9.1** Intelling Group is an equal opportunities employer and is committed to ensuring that all employees have the opportunity to exercise their rights under all company policies. Feedback is welcomed through proper channels. If you do need any assistance in relation to this policy, please inform a member of the Compliance Team.

10.0 Amendments & Deletions

- 10.1** It is understood that amendments and deletions to all or part of this policy may occur at any time and without prior warning. The policy owner agrees to inform relevant parties of any amendments within a reasonable timeframe and distribution to all employees will occur when an updated version is saved.

