



# Modern Slavery Statement for Financial Year 2024/2025

Last Updated By: Pete Graham – Head of Compliance

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# Version Control

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Date	Author	Change Description	Authorised by	Position
08/09/2023	Pete Graham – Head of Compliance	V1.0 Creation	Phil Morgan	CEO
13/12/2024	Pete Graham – Head of Compliance	V1.1 Annual Review Addition of CDD policy & updated template.	Phil Morgan	CEO

# Modern Slavery Statement for Financial Year 2024/2025

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This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Intelling has taken and is continuing to take to try to ensure that modern slavery or human trafficking is not taking place within the business or supply chain and is in relation to year ending 2025.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Intelling has a zero-tolerance approach to any form of modern slavery. Intelling are committed to acting ethically and with integrity in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or the supply chain.

## **What is Modern Slavery?**

Modern slavery is an international crime, affecting millions of people around the world, a growing global issue that transcends age, gender and ethnicities. Sadly, vulnerable people from overseas and the UK, are forced to work illegally against their will across a number of sectors.

## **The Business**

Intelling are a customer management business that uses a combination of clever communication, powerful data and motivated people to grow clients' businesses. By taking ownership of full customer lifecycles and nurturing them through the use of a unique data ecosystem, omnichannel approach and technology stack, significant value is added for clients by delivering cost savings, revenue growth and operational efficiency.

In general, Intelling 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.

## **Intelling values**

- Integrity – Intelling promise to maintain the integrity of people through actions and the people we work with.
- DNA – By enabling people to reach their potential we create the passion, skills and flair that drives the business and partners.
- Be Different – Challenge the norm. Always think of a better way to be different.
- Commitment – We are committed to being a pro-active partner and brand ambassador.

## **Policies**

Intelling utilise several internal policies to ensure that business is conducted in an ethical and transparent manner. Key policies used by the business help to ensure compliance and that people are treated fairly around modern slavery. The policies include:

1. Modern Slavery policy - Detailing the strategies for the abolition of modern slavery within the business and the supply chain.
2. Recruitment policy and process. Including eligibility to work in the UK, or relevant geographic area checks for all employees safeguarding against human trafficking and individuals being forced to work against their will.
3. Whistleblowing policy. Describing how employees can raise concerns around how colleagues are treated or practices within the business or supply chain, without fear of reprisals.
4. Compliant policy – Detailing how anyone can raise their concerns and how Intelling will deal with the concern.
5. Data Transactions CDD and Onboarding Policy

#### **Other Tools within the business**

- Modern slavery awareness training. All employees are introduced to the company policies within their induction training.
- Compliance Team – Manage any concerns around modern slavery and manage due diligence of suppliers.
- Wellbeing initiatives - Managed by the HR department for all staff.

#### **High-risk areas for Intelling**

According to the ILO's 2016 report modern slavery is most prevalent in the Asia-Pacific region and in Africa. Intelling recently opened offices in India and South Africa and has strategic partnerships with parties in both countries. Intelling took steps to ensure the business, and our partners undertake strict due diligence especially when the business expanded, and new suppliers were introduced which required authorisation from Compliance. Hiring Managers must be aware of modern slavery and be able to look out for key signs during interviews.

#### **Intelling's Suppliers**

Intelling operate through a small number of suppliers. Upon undertaking business with a new supplier, we evaluate the risk and request they undertake the relevant level of due diligence including checks around their modern slavery policy.

In relation to the above, as part of Intelling's contract with suppliers, we require conformation:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK-based suppliers) they pay their employees at least the national minimum wage / national living wage (as appropriate) and equivalent overseas.
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
5. Suppliers must agree to the Supplier Code of Conduct ensuring they do their part to ensure slavery doesn't occur within the supply chain.

#### **RCA of complaints**

Compliance complete root cause analysis of complaints and monitor for areas that could indicate modern slavery has occurred.

### **Progress**

Within the last 12 months a more robust onboarding process has been introduced resulting in additional checks for all new clients and clients must adhere to the recently introduced code of conduct.

All areas of the business and our suppliers are subject to periodic audits from Compliance in line with the audit schedule to ensure adherence to the above-mentioned policies and processes.

While there were no reports of modern slavery last year, it is expected that the introduction of the more robust onboarding procedure, along with regular audits ensures protects the potential subjects and Intelling against modern slavery. This will be closely monitored with any trends of due diligence not meeting the required level or audits not meeting expectations reported to the board and relevant authorities.

Compliance will be undertaking annual reviews of the policy and process to ensure it remains robust and any trends are identified, and controls put in place to address them effectively.

If you would like more information please contact [compliance@intelling.co.uk](mailto:compliance@intelling.co.uk).

Updated 13 December 2024

A handwritten signature in black ink, appearing to read 'Phil Morgan', with a long horizontal line extending to the right.

Phil Morgan

Chief Executive Officer

Intelling