

# Modern Slavery Policy

## Policy Document

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Confidential Document

Author: Group Legal

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## Revision History

| VERSION | STATUS | DATE         | BY                              | SUMMARY                  |
|---------|--------|--------------|---------------------------------|--------------------------|
| 1.0     |        | 06 July 2017 | James Liddiard                  | New Policy               |
| 2.0     |        | January 2019 | Group Legal, HR and Procurement | Annual review and update |
|         |        |              |                                 |                          |
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## Sign Off

| VERSION | DATE          | BY             | TITLE | SIGNATURE |
|---------|---------------|----------------|-------|-----------|
| 1.0     | 06 July 2017  | James Liddiard |       |           |
| 2.0     | 29 March 2019 | Board          |       |           |
|         |               |                |       |           |
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## 1. POLICY STATEMENT

- 1.1. It is the policy of The Innovation Group Limited and its group companies (the “Company” collectively “we” or “ours” or “us”) to ensure that our business dealings are carried out in compliance with the relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited. The Company is committed to preventing slavery and human trafficking in our corporate activities and ensuring that our supply chains are free from all forms of modern slavery.
- 1.2 We are aware our supply chain is not reliant on factories or other entities that would normally be associated with slavery and forced labour. The contractors and suppliers used by the Company are not likely to be susceptible to the risk of modern slavery. However we understand that others may not always uphold the same level of standards as us, therefore, we should remain vigilant.
- 1.3 We ask our employees responsible for managing suppliers and others involved with the Company, to be responsible for ensuring that our values and ideals are upheld, and if suspicious to report it to your line manager or via the whistle blowing hotline.
- 1.4 The basic rights we expect all workers to enjoy include:
- (a) The right to a reasonable wage
  - (b) The right to a safe working environment
  - (c) The right to an appropriate level of holiday and cover for period of sickness
  - (d) The freedom to complain directly via our whistleblowing process free of charge, if they believe that they are not being fairly treated or have any other concerns.
- 1.5. The purpose of this policy is to:
- a) set out our responsibilities, and of those working for us, in observing and upholding our position on modern slavery and human trafficking; and
  - b) provide information and guidance to those working for us on how to recognise and deal with modern slavery issues.
- 1.6 This policy does not form part of any employee’s contract of employment and we may amend it at any time.

## 2. WHO IS COVERED BY THE POLICY

This policy applies to all individuals working in all regions and at all levels of the organisation, including senior managers, officers, directors, employees, consultants, trainees, home workers, part-time and fixed-term workers, casual and agency staff (collectively referred to as ‘members of our workforce’ in this policy).

## 3. WHAT IS MODERN SLAVERY

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 to exploit them for personal or commercial gain.

## 4. WHAT IS THE BEST WAY TO REPORT A CONCERN

Please start with talking with your manager. Managers have a responsibility to listen and help in an environment free from retaliation.

If you do not feel comfortable talking with your manager, please contact your local HR, Legal or Compliance team. Alternatively, if you feel that the concern/matter is of a whistleblowing nature, you can confidentially contact the Whistle blowing hotline provided by Expolink. The Whistle blowing hotline is available to all members of the workforce. However you choose to share your concern, we will address it promptly.

The hotline and web-reporting facility are available 24 hours a day, seven days a week, worldwide. The Expolink Line is staffed by a leading, third-party reporting service.

Please refer to the Group Whistle Blowing Policy for further information.

## 5. TRAINING AND COMMUNICATION

- 5.1 Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy.
- 5.2 Our zero-tolerance approach to modern slavery must be communicated to all supplier, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

## 6. RESPONSIBILITY FOR THE SUCCESS OF THIS POLICY

- 6.1 The board of directors of The Innovation Group Limited (the “Board”) has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 6.2 The Board shall ensure that all managers and other members of our workforce who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 6.3 The Board shall review this policy from a legal and operational perspective at least one a year.
- 6.4 All members of our workforce are responsible for the success of this global policy and should not hesitate to disclose any suspected modern slavery issues. Members of our workforce are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed via the Group Legal Department by emailing: [grouplegal@innovation.group](mailto:grouplegal@innovation.group).