



INTERNATIONAL GROUP

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Reviewed: February 2023

Version: 2

Applicable to: All companies

This International Group Limited Policy is approved by the International Group Board. It represents the International Group Board's direction to the business on this topic. Compliance with this policy is mandatory.

Anti-slavery and human trafficking policy statement

This policy applies to all persons working for the Company or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, consultants, contractors and suppliers. International Group and its group companies strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Modern Slavery and Human Trafficking is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Commitments

As a company we expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- (1) We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- (2) The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy. The company's Whistleblowing policy should be referred to if anyone has a concern in this regard.
- (3) We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain. The company expects all suppliers to conduct right-to-work checks of their workforce in accordance with the Immigration, Asylum and Nationality Act 2006.

(4) We ensure our workforce are aware of and have access to our suite of related policies:

- a. Whistleblowing Policy
- b. Anti-Bribery and Corruption Policy
- c. Corporate Social Responsibility Policy

(5) We take a risk-based approach to our contracting processes and keep them under review. Using our risk-based approach we will also assess the merits of writing to suppliers requiring them to comply with our relevant policies which sets out the minimum standards required to combat modern slavery and trafficking.

(6) Consistent with our risk-based approach we may require:

- a. employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our relevant policies.
- b. Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to such policies.
- c. As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our policies.

(7) If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.