



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

April 2018

1. Policy statement

- 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. The Inceptua Group (the **Company**) has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or in any of its supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the policy

- 2.1 The board of directors of the Company's Headquarters has overall responsibility for ensuring this policy complies with our legal and ethical obligations and must take all measures that are within their reach to ensure that all those under our control comply with it.
- 2.2 The Chief of Compliance has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and au-

ditioning internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 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.

2.4 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 Head of Administration.

3. **Compliance with the policy**

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

3.2 **Slavery** can include requiring a person to perform forced or compulsory labour or holding a person in slavery or servitude.

3.3 **Human trafficking** can include the arrangement or facilitation of travel for a person, with a view to exploiting that person.

3.4 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.

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

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

3.7 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Head of Administration as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

- 3.8 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Head of Administration.
- 3.9 We aim 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. We are committed to ensuring 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of Administration immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found within our handbook.

4. Due diligence

- 4.1 Inceptua undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's reviews include:
- 4.1.1 Conducting a bi-annual assessment of our suppliers to complete a self-assessment questionnaire containing question in relation to slavery and human trafficking risk (as part of the Quality Assessment);
 - 4.1.2 Creating an annual risk profile for each supplier based on their location, self-assessment questionnaires and our knowledge of their operations and practices;
 - 4.1.3 Conducting meetings with suppliers to ensure that they have the slavery and human trafficking prevention policies in place and they follow such policies and any/all information obtained from such meetings is documented by us;
 - 4.1.4 The board of directors communicate with employees regarding the importance of ethics and legal compliance [on annual basis]].

5. Communication and awareness of this policy

- 5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided to all individuals who work for us, and further regular training will be provided as necessary.
- 5.2 Our Modern Slavery training covers:
 - 5.2.1 how to assess the risk of slavery and human trafficking in relation to various aspects of the business;
 - 5.2.2 how to identify the signs of slavery and human trafficking;
 - 5.2.3 initial steps which should be taken if slavery or human trafficking is suspected;
 - 5.2.4 the procedure of raising the potential slavery or human trafficking issue to the relevant parties within the organisation;
 - 5.2.5 what external help is available in relation to slavery or human trafficking issues such as Modern Slavery Helpline, Human Trafficking Foundation, National Crime Agency, The Gangmasters and Labour Abuse Authority;
 - 5.2.6 what guidance can be given to suppliers to implement anti-slavery policies;
 - 5.2.7 what steps we should take if suppliers do not implement anti-slavery policies.
- 5.3 We have also raised awareness of modern slavery issues by sending out emails to the staff. Such emails explain to staff:
 - 5.3.1 the basic principles of the Modern Slavery Act 2015;
 - 5.3.2 how employees can identify slavery or human trafficking;
 - 5.3.3 what employees can do to raise issues in relation to potential slavery or human trafficking to the relevant parties; and
 - 5.3.4 what external help is available.
- 5.4 Our zero-tolerance approach to and our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. Breaches of this policy

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.