

Modern Slavery Policy

This policy informs suppliers, business partners, contractors, consultants and other third-party representatives (“Supply Chain Partners”) and employees of IPD Group Limited (“us”, “we”, “our”) about our approach and their obligations in relation to prevention of modern slavery within our business and supply chain.

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 in order to exploit them for personal or commercial gain.

Our Modern Slavery Policy

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, agents, contractors, external consultants, third-party representatives and business partners.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity and transparency in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place in our own business or our supply chain.

Our own business

All employment with us is voluntary. We do not use or condone, child or forced labour in any of our operations or premises and work to ensure these practices are not present in our workforce or supply chain.

We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude. We abide by all laws and regulations regarding pay practices and the classification of employment according to job level and status.

Where we are made aware of modern slavery practices in own business or within our supply chain, we will investigate all claims and if valid, resolve the issue in line with the values expressed in this Policy. We will also provide training with the aim of educating all Employees and Contractors on signs that could indicate modern slavery, due diligence practices for engaging Suppliers, auditing existing Suppliers and what action an Employee or Contractor can take if they have a concern in relation to modern slavery.

Our focus for compliance is support by risk assessments to determine which parts of the business (if any) are high risk for modern slavery.

Supply Chain Partners

We require our Supply Chain Partners to adhere to labor, health, safety and employment laws in the countries in which they operate, and to ensure that they put in place measures to prevent and address modern slavery. Where appropriate and in high risk areas we include specific contractual prohibitions against slavery, and we expect that our Supply Chain Partners will hold their partners in their supply chain to the same high standards.

We recognise our responsibility to take a proactive stance against modern slavery and are dedicated to improving our practices to combat slavery and human trafficking. As part of our commitment to ensuring transparency and responsibility in our business dealings, we have implemented a comprehensive program for conducting Modern Slavery Surveys among our Supply Chain Partners. These surveys are designed to assess the risk of modern slavery within our supply chain and to ensure our suppliers adhere to our stringent standards regarding human rights and labor practices.

The Modern Slavery Surveys form a crucial part of our due diligence and risk assessment processes. They help us to:

1. Identify and assess potential risks of modern slavery in our supply chain.
2. Encourage transparency, allowing us to work collaboratively with our Supply Chain Partners to address any issues identified.
3. Foster a culture of continuous improvement among our Supply Chain Partners by promoting best practices in human rights and labor standards.

We commit to reviewing the effectiveness of these surveys regularly, enhancing our methodologies, and taking appropriate actions based on the findings. We believe that by conducting these Modern Slavery Surveys, we are not only complying with legal requirements but also advancing our mission to promote ethical business practices and human rights worldwide.

Compliance and reporting

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control.

You are required to:

- A. read and understand this policy;
- B. avoid any activity that might lead to, or constitute modern slavery; and
- C. raise any concerns and report any actual or suspected modern slavery within our business or in our supply chain either to the appropriate line manager, HR manager, our legal team or senior management team.

We aim to encourage openness and will support anyone (whether employees within our own business or our Supply Chain Partners) 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 part of our supply chain.

Breach of this policy

If we become aware of any facts to suggest that our employee or a Supply Chain Partner engages in modern slavery, we will investigate, and where appropriate, terminate the relationship and report to the responsible national or international authorities.

Communication

This policy is posted on our internal intranet for employees and is provided to all our Supply Chain Partners. Any changes to this policy in future will be notified to our employees and Supply Chain Partners.

Acknowledgment

I acknowledge that we have received a copy of the IPD Modern Slavery Policy and will comply with these policy conditions.