



<b>Modern Slavery Policy</b> Document name	Reference	
<b>Brenda Boyling</b> Created by	<b>01/09/2023</b> Issue date	
<b>Public</b> Protection status	<b>1.1</b> Issue no.	<b>1 of 2</b> Page no.

This document should be read along with the iCT4 Modern Slavery Statement.

### Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

### Responsibility for this policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those employed by iCT4 Limited or under our control eg supply chains comply with it.

The Managing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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.

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 Managing Director.

### Compliance with this policy

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

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 iCT4 Limited or under our control eg supply chains. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

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.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify the Managing Director and report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we





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will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

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 the Managing Director.

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 Business Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Key areas / working practices that iCT4 Limited prohibit are listed below, there are no exceptions permitted to these rules:

1. Use of worker-paid recruitment fees are prohibited.
2. Confiscation for employees / workers original identification documents is prohibited. Specified iCT4 Limited employees must be permitted to take copies of identification documents to prove eligibility to work in the UK. The original documents will not be held by the company and will be returned immediately when copies are complete or immediately on request of the employee / worker.

iCT4 Limited will support and guide any employee / worker that has been part of enforced modern slavery in previous employments. iCT4 will seek guidance and advice to best support the employee, companies / support groups that we may obtain assistance and direct the employee are listed below:

[Modern Slavery Helpline](#)

[Modern slavery | The Salvation Army](#)

[Victim Support](#)

[Citizens Advice](#)

[Make a claim to an employment tribunal: When you can claim - GOV.UK \(www.gov.uk\)](#)

[National Minimum Wage and National Living Wage rates - GOV.UK \(www.gov.uk\)](#)

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