



# ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

## POLICY STATEMENT

i3Secure Ltd 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 & Human Trafficking is a crime and a violation of fundamental human rights**

## COMPLIANCE WITH THIS POLICY

This policy applies to all persons working for, or on behalf of i3Secure in any capacity, including employees at all levels, directors, officers, agency workers, agents, contractors, and suppliers.

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 us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

## RELATED POLICIES AND PROCEDURES

This Modern Slavery (Anti-Slavery and Human Trafficking) Policy interacts with the following workplace policies and procedures. You are encouraged to familiarise yourself with the policies detailed below. If you have any queries about this policy, please contact the Governance Risk and Compliance Director.

- Whistleblowing policy
- Third party supplier questionnaire

## COMMITMENTS

Modern slavery 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.

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- 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.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require:
  - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- 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 Code of Conduct.

i3Secure commits to uphold the following principles:

- Adherence to local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibit any threat of violence, harassment, and intimidation
- Prohibit the use of worker-paid recruitment fees
- Prohibit compulsory overtime
- Prohibit child labour
- Prohibit discrimination
- Prohibit confiscation of workers original identification documents

## BREACHES OF THIS POLICY

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 to reporting of the situation to the relevant authorities.

## RESPONSIBILITY

i3Secure have overall responsibility for ensuring this policy with senior management; and managers have day to day responsibility to ensure compliance with our legal and ethical obligation

The Governance Risk and Compliance 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

## CONCLUSION

Slavery and Human Trafficking are serious crimes and we are pleased to submit this Policy outlining the commitment of i3Secure Ltd to the aims of the Modern Day Slavery Act 2015.

Mike O'Regan  
Director  
4 January 2020