



Modern Slavery Policy

Policy statement

We take a zero-tolerance approach to modern slavery and are committed to acting professionally, fairly and with integrity towards our staff, freelancers and in all our business dealings and relationships with third parties in our supply chain. This level of commitment is required from our contractors, suppliers and business partners too and is reinforced by contractual obligations.

We will uphold all laws relevant to countering modern slavery. Forcing individuals into slavery or servitude, human trafficking and committing an offence with the intention to commit human trafficking are all criminal offences. We therefore take our legal responsibilities very seriously.

The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on modern slavery; and
- provide information and guidance to those working for us on how to recognise and deal with modern slavery concerns.

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, family members, suppliers, distributors, business partners, agents, contractors, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all persons working for IDology Partnership LTD or on its behalf in any capacity, including freelance employees, contractors, external consultants, third-party representatives and business partners.

What is modern slavery?



Modern slavery is the illegal trade of human beings for the purpose of commercial sexual exploitation or reproductive slavery, servitude, forced or compulsory labour, human trafficking or a modern-day form of slavery.

- Slavery is the behaviour which deprives the victim of his or her freedom as though the offender owns the person;
- Servitude is the obligation to provide services that is imposed by the use of coercion;
- Forced or compulsory labour is a service which is exacted from a person under the menace of any penalty, where the person has not offered themselves voluntarily and involves coercion, which may be direct threats of violence or more subtle forms of compulsion; and
- Human trafficking arises when a person arranges or facilitates the travel of another person with a view to that person being exploited even where the victim consents to the travel.

Anyone can become a victim of modern slavery. There are several ways you might encounter a victim of modern slavery, these include:

- a person may tell you about their experience;
- you detect signs that suggest a person may have been a victim of modern slavery;
- through a third party.

Having assessed the sector in which the Company operates and considered its supply chains, the Company deals with third parties which operate in businesses. This includes employees recruitment and HR, and those that are responsible for the support and development of others.

Signs to spot potential victims include:

- is the person in possession of their legal documents (passport identification and their own bank account details) or are these being held by someone else? Victims will often be forced to use false or forged identity documents.
- do they appear under the control or influence of others and rarely



interact with colleagues?

- are there a group of workers who have their wages paid into the same bank account? Are they having wages taken off them for accommodation, food or to repay supposed debt?
- is the person afraid of the authorities (police, immigration, tax office)?
- are there a number of people who are listed as living at the same address? This may indicate high shared occupancy, often a factor for those being exploited.
- do they appear to be moving location frequently? This may indicate that they are under another's control.
- do agency staff have a written contract of employment with their agency? Is there any suspicion that they have had to pay any direct or indirect fees to obtain work?
- do they give a vague and inconsistent information about their medical history or about how they sustained an injury?

Your responsibilities as a contracted worked for IDOLOGY Partnership Ltd

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

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

All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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

Action will be taken against any third parties who breach this policy, which could result in their relationship with the Company being terminated.

How to raise a concern



You are encouraged to raise concerns about any issue or suspicion of modern slavery in the Company or in its supply chains 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 Katie Casey (Director).

If you are unsure whether a suspicion indicates modern slavery, or if you have any other queries, these should be raised with the Director.

In all cases, trust and act on your instinct that something is not quite right. It is usually a combination of triggers, an inconsistent story and a pattern of symptoms that may cause you to suspect modern slavery.

If you think that someone you work with at the Company or at a third party may be a victim of modern slavery, in addition to the above, you can call the modern slavery helpline on 0800 0121 700 and talk through your concerns or visit www.modernslavery.co.uk which provides more information on the types of slavery, the signs to spot and the appropriate referral processes for victims.

Protection

Workers who raise concerns are sometimes worried about possible repercussions. 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.

Who is responsible for the policy?

The board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Director Katie Casey has 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.

Awareness of the policy

Awareness of this policy, and on the risk our business faces from modern slavery in its supply chains, [forms part of the induction process for all individuals who work for us.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Monitoring and review

The board of Directors will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

All workers are responsible for the success of this policy and should ensure they use it to raise concerns of any suspected modern slavery.

This policy does not form part of any employee's contract of employment and it may be amended at any time.