



# Anti-Slavery & Human Trafficking Policy

## 1. POLICY STATEMENT

I-Watchers Limited is committed to driving out acts of modern-day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain within I-Watchers Limited. As part of the company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

The company will not support or deal with any business knowingly involved in slavery or human trafficking. The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chain.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Quality Management System, compliant with the requirements of ISO 9001:2015. The implementation and operation of this management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Director to ensure its continuing suitability and relevance to the company activities.

## 2. RESPONSIBILITY FOR THE POLICY

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

2.2 The compliance officer 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.

2.3 The Director is responsible for ensuring those reporting to him 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 compliance manager.

## 3. COMPLIANCE WITH THE POLICY

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

3.2 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.

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

3.4 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.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your Director or Compliance officer as soon as possible.



3.6 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 compliance officer.

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

#### **4. COMMUNICATION AND AWARENESS OF THIS POLICY**

4.1 Training on 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, and regular training will be provided as necessary.

4.2 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.

#### **5. BREACHES OF THIS POLICY**

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

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

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A signed copy is available upon request.