

Modern Slavery and Human Trafficking Policy (Including Procedure)

Policy Statement

IHSS are committed to the highest standards of ethical business behaviour and treatment of the people that work for us and with us. IHSS have a zero-tolerance approach to modern slavery and seek integrity and transparency in all our business dealings and relationships to address any modern slavery throughout our supply chain.

Modern slavery is determined by the Modern Slavery Act 2015 and is both a crime and a violation of fundamental human rights. It can be evident in various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. All of these are forms of exploitation of people for personal or commercial gain and involves the deprivation of liberty for those purposes.

IHSS require having implementation and enforcement of effective systems and controls to ensure modern slavery is not taking place anywhere in our own business nor in any of our supply chains.

Statement on Compliance with the Modern Slavery

IHSS Ltd are committed to the highest possible ethical standards and corporate conduct and we expect our suppliers and customers to adhere to these same standards. The organisation has a zero-tolerance approach to modern slavery and human trafficking that requires our suppliers and customers to understand our expectations on anti-bribery, corruption, legal compliance and ethical conduct.

Our values

IHSS operates with strong corporate values: Safety, Integrity, Caring and One Team.

Our values are underpinned by a set of corporate policies supporting our commitment to high ethical standards and doing business with integrity. Our adherence to these policies is subject to regular reviews, helping us to continuously improve in this area.

A Modern Slavery & Human Trafficking policy reinforcing our commitment to ensuring there are no instances of forced labour, slavery or human trafficking in our business or supply chain and helping our people to identify these practices;

We expect the same high standards from all of our contractors, suppliers and other business partners: as part of our contracting processes, we include a commitment and specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This Policy does not form part of an employee's contract of employment and will be amended from time to time. If there is any discrepancy with this Policy and legislation, the legislation will prevail.

Whom does the Policy apply to?

This policy applies to all persons or organisations (of any size) working for us, or on our behalf, in any capacity. This includes but is not limited to, employees at all levels, directors, officers, agency workers, seconded workers, apprentices, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

Purpose

The purpose of this Policy is to:

- Clarify who this Policy applies to
- Explain what people are required to do
- Give people the confidence to report any genuine concerns regarding wrongdoing without fear of reprisal, criticism or discrimination

Objectives

The Policy objectives are to:

- raise awareness of modern slavery and human trafficking to help those it applies to recognise any circumstances or situations for concern in the workplace
- encourage an open and protected environment for concerns to be raised, investigated and properly addressed, without fear of reprisal, criticism or discrimination
- give assurance of IHSS's commitment and support for sharing genuine concerns at an early stage, confidentially, and without fear of victimisation

By promoting and supporting this Policy, IHSS wishes to set out its expectations for people working for us and all of our customers, contractors, suppliers and other business partners.

What is Human Rights Risk Analysis?

Risk Analysis – For VAMED group the material risk area's that have been identified are:

- Social & Labour standards
- Health & Safety
- Patient Safety
- Data security
- Environmental Damage

Some examples are provided below to give you some context:

- Individuals are forced to work through mental or physical threat
- Individuals who have been dehumanised, treated as a commodity or bought/sold as property
- Individuals who are physically constrained or have constraints or restrictions placed on their freedom
- Availability and safety of personnel, technical equipment and decisions made by our customers
- Protection against abusive data processing and protection of personal rights

The results of above Risk Analysis are measured under three categories

- Improvement - Major risks for which action is necessary. High Level of attention
- Monitor - Transitional area, for whose risks it has to be decided individually whether a measure is necessary or not
- Accept – Negligible risks for which generally no measures are necessary.

Confidentiality and Protection of Employees

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.

IHSS encourages 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 that 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 your Line Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, or to the central HR team.

Procedure

If you believe, suspect, or 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, or that it may occur, you must report your concerns as soon as you become aware.

Every report will be treated seriously and will be fully investigated.

Reporting

As soon as possible, a person that this Policy applies to **must**:

- report their concern through their Line Manager or HR Manager, if it is appropriate to do so and they feel comfortable; or
- report it in accordance with our Whistleblowing Policy. This can be from the outset or after speaking to their Line Manager.

Investigation

- All reports will be acknowledged and investigated and the likely timeline for an investigation is within 28 days. If the person raising the concern is known, and enquiries cannot be completed within 28 days this will be explained.
- The Whistleblowing process will oversee the investigation of reports received.
- The format of an investigation will depend on the subject matter, but will usually involve interviews with relevant people and witnesses, as well as consideration and review of any documentary evidence.
- In circumstances where there may be civil or criminal offences involved, the concern will be notified to the Police and investigated with full cooperation from IHSS.

Breach of the 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 or fail to meet the high levels of commitment we require in relation to modern slavery.

Policy Responsibilities

The Board of Directors of IHSS Ltd have overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Senior Management Team have the 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.

Specifically:

Management / Directors Must:

- Read, understand and follow the principles in this Policy and any associated documents
- Communicate our zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced, as appropriate, thereafter
- Keep up to date with changes to this Policy and any associated documents, including in particular terms that are required in our third party contracts
- Treat any reports made to them seriously, confidentially and report them immediately to the HR in capacity of Whistleblowing report.
- Investigate reports thoroughly when requested or authorised to do so
- Respect the reporter's right to anonymity if requested
- Ensure there are no unnecessary delays concluding an investigation;
- Ensure the disclosing Employee is not subject to any form of harassment, discrimination or any other detrimental effect as a result of making a report

Employees Must:

- Read, understand and follow the principles of this Policy and any associated documents
- Seek clarification on any points which are unclear
- Make any legitimate report which they believe falls under this Policy
- Act in good faith when making a report

Human Resources Must:

- Read, understand and follow the principles of this Policy and any associated documents
- Support all Employees when using this Policy
- Monitor the application of this Policy to ensure fairness and consistent treatment
- Advise the Teams if they believe updates are required to the Policy

Reviews and Updates

This policy and any associated Policy will be reviewed on a regular basis, at least annually, and will be updated and re-issued as required.

Associated Policies

- Whistleblowing Policy
- Grievance Procedure and associated documents
- Bribery, Gifts and Entertainment Policy

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