



ICR GROUP ANTI-SLAVERY POLICY

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Signature		Signature		Signature	

REVISION CONTROL

Revision	Description of Change	Date
00	First issue on BMS	19/06/2020
01	New signatories updated and mirror wording amendments	19/01/2024
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ICR GROUP ANTI-SLAVERY POLICY



This Policy applies to all persons working for ICR or on our behalf in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, and business partners.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, child labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. ICR has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the ICR business or in any of its supply chains.

ICR is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. ICR expect the same high standards from all our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. ICR expect that our suppliers will hold their own suppliers to the same high standards.

- The ICR Management Board (AMB) 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 ICR CEO has primary responsibility for ensuring the implementation and communication of this Policy, monitoring its use and effectiveness, ensuring any queries about it are resolving, and monitoring internal controls and procedures to ensure they are effective in countering modern slavery.
- Management at all levels are responsible for ensuring they, and those reporting to them, understand and comply with this Policy and are made aware of the issue of modern slavery in supply chains.

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

- We will avoid any activity that might lead to, or suggest, a breach of this Policy
- We will encourage and empower anyone to raise concerns about any issue or suspicion of modern slavery in any parts of ICR's business or supply chains of any supplier tier at the earliest possible stage.
- If we believe or suspect a breach of this Procedure has occurred or that it may occur, you must report it in accordance with ICR's Whistle-Blowing Procedure as soon as possible.
- Training on this Procedure, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.
- ICR's zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners and reinforced as appropriate thereafter.
- ICR may terminate our relationship with other individuals and organisations working on our behalf if they breach this Procedure.

ICR is 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.

Jim Beveridge
Chief Executive Officer (CEO)
Date: 19/01/2024

A handwritten signature in blue ink, appearing to read 'Jim Beveridge'.