

# Modern Slavery Policy

## Introduction

This policy confirms Interr's commitment to ensuring that there is no slavery or human trafficking in our supply chains and that we do not work with any other business who take part in and/or support slavery or human trafficking.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Interr Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Interr Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## What is modern slavery?

Modern slavery is when one person possesses or controls another person in such a way as to significantly deprive a person of their liberty with the intention of exploiting that person through their use, profit or disposal.

## Who does this policy apply to?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

## Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. All are available upon request, on our website as well as within our Interr's Head Office.

## Our commitment

Interr Ltd is against any form of slavery and human trafficking and believes that all humans should have the right to live a free life. We are in full support of the Modern Slavery Act that came into effect on 26<sup>th</sup> March 2016. Interr have zero tolerance on corruption and bribery.

This policy confirms that we are a company focused on equality, diversity, fair opportunities and have a strong ethical grounding on the way we should act as a business and as a society.

To ensure we can support this act and the abolishment of slavery, we are committed to:

- Working in compliance with the modern slavery act.
- To ensure that we will not partake in or work in partnership with a third party who partakes in and/or supports slavery.
- To ensure the company publishes an annual anti-slavery statement when applicable.
- Completing reviews on all our service partners annually.
- Having a policy in place to encourage any concerns to be raised and to ensure the protection of whistle blowers.
- To ensure we regularly visit our client's premises and complete background checks on all our staff.
- To ensure we work in accordance with the working time directive.
- Where possible we build long standing relationships with our suppliers and customers.

## Our suppliers

Interr Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on-site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
- We may terminate the contract at any time should any instances of modern slavery come to light

Interr Ltd will only use suppliers who conform to essential labour standards, including the following:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided if possible
- No harsh or inhumane treatment is allowed

Suppliers should, as a minimum, comply with all statutory and other legal requirements relating to the environmental impacts of their business.

The supplier should not be engaged in the sale of arms to governments that systematically violate the human rights of their citizens; or where there is internal armed conflict or major tensions; or where the sale of arms may jeopardise regional peace and security.

## Training

The management team are responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly.

All employees receive an induction into the business where our policies, procedures and expectations are outlined. We regularly conduct training for our management and staff so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## Responsibility for the policy

Ultimate responsibility for the prevention of modern slavery rest with the Company's leadership. The Board of Directors of Interr Ltd has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers 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

## Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified (this could be via emails, phone calls, reports, etc)

## Compliance with this policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chain 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. You must notify your manager or the Human Resources Department as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier 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 your manager or report it in accordance with our Whistleblowing Policy as soon as possible. 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 chain constitutes any of the various forms of modern slavery, raise it with your manager or the Human Resources Department.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy and 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 part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager or our HR Department immediately.

## Breaches of this policy

We reserve the right to terminate our relationships with individuals (dismissals under misconduct or gross misconduct) and/or organisation in our supply chain if they breach this policy.

## Policy Review

This policy was last reviewed and agreed by the board and seeks to be reviewed and updated annually. Any queries arising regarding this policy should be addressed to Mick Tabori.



Mick Tabori - CEO  
November 2020