



Modern Slavery Policy

Policy Summary

Policy Summary:

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

Policy Scope:

IKO PLC is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all our contractors, suppliers, and other business partners. As part of our supplier agreement processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards.

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 and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

This policy is non-contractual and does not form part of employees' terms and conditions of employment and may be amended at any time.

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Policy

1. Responsibility for the policy

The Procurement Department 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 Supply Chain Director 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.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

2. Compliance with the policy

The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all Employees.

Employees 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 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, it should still be reported to Management or the Procurement Department or via the IKO Whistle-blower policy.

3. Communication and awareness of policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed.

IKO PLC's zero-tolerance approach to modern slavery must be communicated to all suppliers and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. A copy of this policy to be included in the new supplier 'On-Boarding Pack'.

4. Breaches of this policy

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

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

5. Procedure

Upon identifying or receiving a report of Modern Slavery or violation of the principles of the ETI Base Code,

- Inform IKO Supply Chain Director who will advise the Board of Directors.
- A confidential investigation to be instigated.
- Assess appropriate level of response, if within the UK contact a UK Support Provider for advice (details found on gov.uk/support-organisations) then follow their advice to ensure the safety of the workers in question. If outside of the UK contact 'Anti-Slavery International' for advice and follow their guidelines noting the following principles,
- Understand and respect worker's needs.
- Recognise that their livelihood may be at stake through inappropriate intervention.
- Immediate termination of a supplier or removing a worker from a situation may cause harm.
- Work with the supplier to improve and address risk, highlight our policies and business consequences of failing to adhere to those policies.
- Report to local authority only if advised and terminate business if progress is not made and if deemed safe to do so.

Related Policies, Documents & Forms

ITEM NAME	LOCATION
Disciplinary Policy	Company Intranet, HR Department

Key Contacts

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