

POL 06: Modern Slavery Policy

Introduction

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 in order to exploit them for personal or commercial gain. We have 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 our own business or in any of our supply chains.

We are 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. We expect the same high standards from all of our contractors, suppliers and other business partners.

This policy applies to all persons working for us or on our behalf in any capacity, including directors, employees at all levels, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and all business partners and anyone at any given time that is engaged with ITC.

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

This statement sets out ITC Concept Ltd actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1st May 2023 to 30th April 2024.

We review and update our statement annually including reviewing that our suppliers and sub-contractors are adhering to the Modern Slavery Act and requirements, providing policies where appropriate, directly to ITC or via Constructionline.

As part of the Construction industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic.

Organisational Structure and Supply Chains

This statement covers the activities of ITC:

- As an organisation, we have a chain of immediate suppliers, many of whom in turn have their suppliers, making our total supply chain very large and complex.
- As a Main Contractor within the industry, the organisation sub-contracts its work out to sub-contractors, who are assessed, prior to being issued with a purchase order.
- We currently operate in the United Kingdom only.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- The board of directors 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 Managing 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 adequate advice, guidance and literature internally by trained personnel and sourced from UK government <https://www.gov.uk> website on the issue of modern slavery in supply chains.
- 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 raised via our “Have your Say!” system.

Relevant Policies & Standards

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy.** We encourage all our team, and other business partners to report any concerns related to the direct activities of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for all our team to make disclosures, without fear of retaliation via our anonymous “Have Your Say!” suggestion system.
- **Mission, Vision & Values.** These set out clearly the expectations and values we require of our team.
 - **Vision.** Our vision is to be a business driven by talented construction professionals, providing an environment that fosters personal growth and encourages self-pride.
We define ourselves from the competition as the construction company of choice, by being a positive, dynamic and enthusiastic team, that delivers truly great projects.
 - **Mission.** To build great spaces and to exceed our client’s expectations, every, single, time. We achieve this by defining our own standards against which we measure ourselves. By looking at how things can be improved, we collaboratively work towards making our processes, and environment, better than before. Building a great company together.
 - **Values - Believe in our people.** We believe in the people within our organisation, and those of the organisations we work with. We always act professionally with respect, fairness and courtesy.
Believe in our work - We believe in the work we do, and the teamwork and collaboration it takes to achieve excellent standards.
Believe in being better - We believe in continually developing our skills, processes, environment, and relationships to enhance our delivery and improve the service we provide.
- Other policies relevant to our business are POL 05 Anti-Corruption & Bribery, POL 21 Social Media, POL 25 Recruitment Policy Statement and [EN02](#) Corporate Society Responsibility statement.

Due Diligence

- **Direct Employees.** For direct employees of the company, either at interview stage or as part of the induction process, the employee will be asked to produce their passport or other photographic proof of identity, plus work permits for the UK, if relevant. This ensures that we are satisfied that the employee has the legal right to live and work in the UK. We will never demand deposits from our workers or hold on to their identity papers in compliance with our GDPR Policy.
- **Agency Labour.** We have various agreements in place with a number of agencies who provide us with temporary staff as and when required. The agencies are required to bear the responsibility for vetting their candidates for their eligibility to work in the UK. The HR Manager undertakes spot checks to vet this process.
- **The Supply Chain.** As a Main Contractor within the industry, the organisation subcontracts its work out to subcontractors, who are assessed, prior to being issued with a purchase order. The principal method of assessing our subcontractors is to see if they are registered with Constructionline, a government backed organisation, used for procurement of suppliers and subcontractors across the nation. Constructionline assesses the organisation's health & safety and all other areas of compliance, including requesting sight of their Slavery and Human Trafficking Statement, if they have one. If a company is registered with Constructionline (Level 2 Silver or above), then they are deemed to be approved for ITC's supply chain.

Should a company not be registered with Constructionline, ITC will issue an assessment form for satisfactory completion, prior to placing an order. These forms [AC05](#) or [AC01](#) (supplier approval form) will ask whether the company has a Slavery and Human Trafficking Statement in place and to be given a copy of the statement. We look to ensure, that our supply chain accords with legislation.

Furthermore, ITC will never subcontract any work out to any subcontractor who is not registered under the government's Construction Industry Scheme.

By its very nature, the construction supply chain is complex, and there are often many tiers of suppliers between ITC and the source of the raw materials; often with procured services and materials flowing from all parts of the country.

With these initial checks, we believe that we are working with ethical and likeminded companies.

Training

All our team members are trained in and understand how to identify human trafficking and modern slavery. <https://www.gla.gov.uk/publications/resources/glaa-videos/glaa-modern-day-slavery/>

All members of our team are required to complete mandatory annual Modern Slavery & Human Trafficking online training annually.

Board Approval

This statement was approved on 13th March 2023 by our board of directors, who review and update it annually.

Director's signatures:



Director's names: Nick Conway / Tony Smith

Dated: 1st November 2023