	ICD EUROPE – ANTI-SLAVERY & HUMAN TRAFFICKING POLICY			
	Document Ref:	ICD-E-004-4		
	Issue No:	1	Revision No	2
	Issue Date:	11/10/23	Revision Date	10/10/24
ICD EUROPE LTD				

Modern Slavery and Human Trafficking Policy

Definitions

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Policy Statement

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 and suppliers. ICD Europe Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Anti-Slavery

This ICD Europe Ltd's Policy is approved by the ICD Group Board; it represents the ICD Group Board's direction to the business on this topic. Compliance with this policy is mandatory through aligning ICD Europe Ltd Management System processes and people behaviours to the commitments below.


Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains;
 - The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy;
 - We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain;
 - We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking;
 - Consistent with our risk-based approach we may require:
 - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct;
 - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code;
 - As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct;
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

Child Labour, Forced Labour and Human Trafficking

The Modern Slavery Act of 2015 requires certain businesses to provide disclosure concerning their efforts, if any, to address the issues of slavery and human trafficking in their supply chains. The disclosures are intended to provide clients with the ability to make better, more informed choices about the company which they support.

 ICD EUROPE LTD	ICD EUROPE – ANTI-SLAVERY & HUMAN TRAFFICKING POLICY			
	Document Ref:	ICD-E-004-4		
	Issue No:	1	Revision No	2
	Issue Date:	11/10/23	Revision Date	10/10/24

We confirm without reservation that ICD Europe Ltd is totally committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations and that of our supply chain.

ICD Europe Ltd recognises that slavery and human trafficking can occur in many forms. Therefore, throughout this policy we use the terms “slavery and human trafficking” to encompass various forms of coerced labour.

Our commitment to human rights is outlined in our Code of Conduct which is set out below. We have a commitment to improve and implement the Code of Conduct across our supply chain.

ICD Europe Ltd takes steps to verify, evaluate and address risks of slavery and human trafficking in our supply chain. The first step in this process is to set clear expectations for our suppliers. Our Code of Conduct states “We do not tolerate forced, debt bonded, indentured labour practices or human trafficking. ICD Europe Ltd does not allow harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment. We expect our suppliers and others to meet these expectations”. Our Code of Conduct also, in turn, provides that “forced, bonded including debt bondage or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used”.

We regularly notify our suppliers of their obligation to comply with our Code of Conduct. Our verification process involves an assessment of our suppliers, who are required to complete a self-assessment questionnaire, including questions targeted at slavery and human trafficking risk. ICD Europe Ltd uses this questionnaire to determine the risk profile of suppliers for environmental, safety, human rights (including slavery and human trafficking) and other supplier sustainability issues. We view assessments and audits as integral parts of our overall supply chain management process. They help us identify compliance gaps where immediate action is needed, and root causes that enable development of systemic solutions and improvements.

ICD Europe Ltd sets the tone of our ethical culture and holds management accountable for communicating ethics and compliance expectations. Each year our Chief Executive Officer communicates with employees and senior managers the importance of ethics and legal compliance. We believe that this “message from the top” along with ethics and compliance training and regular communication throughout the year, helps to create an ethical and legally compliant culture within the business.

Through our Code of Conduct we seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations. The principles embodied in our Code of Conduct reflect our policies related to but not limited to slavery, human trafficking, conflicts of interest, non-discrimination, antitrust, anti-bribery, and anti-corruption and protecting our company’s reputation.

Review

Within the Company, the suitability and effectiveness of all our policy and management system is reviewed at senior management meetings annually. This policy is communicated to all staff and interested parties on request.

Responsibility for authorizing, implementing and communicating on behalf of ICD Europe Ltd.



Wayne Hawkes

Managing Director

Next Review Due: Oct 2025