



## Installation Technology Ltd Anti-Slavery & Human Trafficking Policy

### ***Introduction & Policy statement***

This Statement is designed to satisfy the requirements of the Modern Slavery Act 2015, by informing our customers, suppliers, staff and the public about Installation Technology's policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains and the steps taken to identify, prevent and mitigate the risks.

### ***Installation Technology Ltd.***

- Have a commitment to raising awareness of modern slavery issues including how to spot the signs in the business and supply chain.
- Provisions for whistleblowing or other mechanisms for reporting issues
- The CAO / Director is the nominated person-the Designated Safeguard Lead ( DSL) within Installation Technology Ltd that has responsibility for preventing modern slavery within the business.
- We have a commitment that this policy applies and is communicated within Installation Technology Ltd and our supply chain
- A Commitment to address and directly prohibit practices that are known to contribute to the risk of modern slavery
- Maintain our internal due diligence requirements for the business and supply chain and take steps should modern slavery practices be identified within the company or supply chain
- Maintain our process for the identification of and management requirements for any high-risk materials /labour sourcing

Installation Technology has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure Modern Slavery is not taking place in our own business and supply chains. We are committed to ensuring our business is transparent, as such we will comply with the disclosure obligations under the Modern Slavery Act 2015 and the ILO/UN Guiding Principles.

Installation Technology expects our contractors and suppliers to uphold high standards in all business practices; as part of the contracting processes, we include prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, anyone held in slavery or servitude. We expect their suppliers to hold these high standards. We will be auditing our higher risk suppliers, as determined by our predetermined criteria.

This policy applies to all persons working for, or on behalf of Installation Technology, in any capacity. This includes but does not limit the policy applicability to, employees, agency workers, temporary staff, agents, contractors, external consultants and third-party representatives. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

All employees are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains. Employees are required to avoid any activity that



might lead to a breach of this policy, and the Modern Slavery Act 2015.

Everyone must notify their manager as soon as possible if they believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur, in the future. Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage.

If anyone is unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply. Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them. Suppliers are asked to comply with our Anti-Slavery and Human Trafficking policy from the onset of the relationship. Suppliers who are unwilling to comply will not be on boarded.

### ***Procedures & Processes***

In line with Government supply chain guidance the following is implemented to ensure compliance.

#### ***1. Organisation Structure , Business & Supply Chain***

Our organisation structure consists of Operations, Professional Services , Commercial services , financial Services & Shared Services. The Shared Services team along with the board of directors are responsible for compliance with policy both within the company & our wider supply chain. The Chief Administrative Officer is the nominated person within Installation Technology Ltd that has responsibility for preventing modern slavery within the business and as such is the Designated Safeguard Lead ( DSL) for the company.

With over four decades of experience, Installation Technology has been at the forefront of delivering and supporting operationally critical networks in some of the most highly regulated environments , such as healthcare, transport, education & construction. We Design, Supply and Install Data, Voice and Electrical Cabling Network Infrastructures, Integrating Environmental Monitoring and CCTV systems. Our trusted supply chain partners have worked with us for many years & have all gone through our rigorous on boarding process to ensure compliance with our modern slavery policy. All suppliers undergo a quarterly review where labour is checked and reviewed by installation technology ltd to ensure compliance. We will work collaboratively to address any instances of modern slavery with our supply chain.

#### ***2. Policies & documents in relation to slavery & human trafficking***

The following policies in relation to modern slavery are implemented by our compliance manager & over seen by the Chief Administrative Officer (the DSL), who is a company director. These are available on request to our staff, clients & suppliers:

- Corporate social responsibility policy statement 2024
- Data Protection Policy statement 2024
- Equality, Diversity & Inclusion Policy Statement 2024
- Employee Training & Development Policy Statement 2024
- Health & Safety Policy Statement 2024
- Occupational Health Policy Statement 2024



- Risk Management Policy statement 2024
- Employee Recruitment and Selection Policy Statement 2024
- WorkSafe Policy statement 2024
- Fatigue Management Policy Statement 2024
- Quality Management System -Company Procedures ( CP)
- CP -5 Ethical sourcing and purchasing
- CP-26 Supplier & contract management
- Company Employment Handbook

### ***3. Due diligence processes in relation to supplier audits***

Installation Technology have a robust process to ensure due diligence with our onboarding of new and existing suppliers.

Our company Process ( CP) 26- Supplier & contract management- contains a detailed process for the selection , review & continued monitoring through supplier performance reviews & site activities to ensure due diligence with staff.

In addition to this all the supply chain are required to complete our 'ethical sourcing declaration' to ensure.

- Code of Conduct is adhered to
- ILO Labour standards are followed
- 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
- No harsh or inhumane treatment is allowed

### ***4. Risk assessments of supply chains***

The following risk assessments are considered when on boarding suppliers or recruiting new staff into the company



Category	Supply Chain	Risk	Mitigation
Operations	All Labour Suppliers	Risk of multi-tiered supply chains involving the use of 'casual' labour agencies which could result in poor labour practices due to lack of transparency. Unethical practices including workers being charged unlawful or excessive recruitment fees, workers being misinformed about terms	Onboarding checks , Suppliers must declare all third party's Quarterly supplier reviews to check changes in team sheets, due diligence & onsite monitoring of staff. Monthly KPI to identify incidents with staff. Staff sponsorship - Sentinel process ( Rail)
Facilities, Office, Cleaning	Trusted UK Based Companies	Low skilled labour; migrant labour; agency labour leading to lack of transparency in employment practices.	Onboarding checks , Suppliers must declare all third parties. DSL liaison with Company lead & office visits to meet staff weekly
Procurement	Various	Overseas imports - Labour intensive, often low-skilled work; mining of raw materials in high-risk countries. Poor labour practices including underpayment of wages, delayed payment, or wage deductions; physical abuse; working excessive overtime; worker's visa or permit is tied to a single employer; and financial penalties for early contract termination Risks include gender inequality; weak protection of workers' rights; poor labour practices including excessive overtime, underpayment, or deduction of wages; financial penalties for leaving employer and structural integrity of factories.	Company Ethical sourcing procedure & checks – Annual review of supply chain.
Recruitment	All Staff	Illegal vulnerable workers	Company Outreach teamwork with local authorities – Robust recruitment process with employment law checks – MENTOR HR advice & consultancy 24/7

### 5. Anti – Slavery performance measured against key performance indicators ( KPIs)

Our company Process ( CP) 26- Supplier & contract management- contains a detailed process for the continued monitoring through supplier performance reviews & site activities to ensure due diligence with staff. Both management tours & planned general inspection provide daily reports which feed into our shared services management team & head of HSE. Key performance indicators are provided monthly and are shared to the Senior Leadership Team for review at



regular meetings.

Suppliers are reviewed quarterly and attend a meeting by the CAO, COO, Compliance Manager, The head of HSE , the Learning & Development manager & the finance team.

The following are discussed.

- Business Update
- Labour competency & selection
- Health & Safety
- Performance review
- Improvement Opportunities
- Risks
- Commercials
- Year Look Ahead
- Actions review

All the results of meeting form part of our overall key performance indicators which help drive continued improvement with our supply chain.

## **6. Modern Slavery Awareness Training**

Modern Slavery training & awareness.

The company raise awareness with all employees through a detailed induction with Installation Technology People & Talent manager covering all elements of HR and our code of conduct.

In depth Modern slavery awareness training is also conducted annually for:

Commercial managers , Recruitment / HR & Outreach team , Procurement , stores & logistics team and our site HSQE team.

This is done via our consultants – MENTOR who also provide legal & HR compliance advice 24/7, & the Chartered Institute of procurement and supply ( CIPS) eLearning as required.

## **7. Duty to notify**

Under the Modern Slavery Act 2015, specified public authorities (eg the National Crime Agency, a county council, or the Gangmasters Licensing Authority) have a duty to notify the Home Office if they have identified a potential victim of slavery or human trafficking in England and Wales.

## **8. Whistleblowing**

Raising a concern about illegal or dangerous activities that are happening, have happened or are likely to happen within the organisation is called whistleblowing.

The concern will be dealt with internally in line with your organisation's whistleblowing policy.

Provided you follow the correct reporting process, you are protected from being treated unreasonably at work and from dismissal, even if an investigation finds no wrongdoing. You can get legal advice or contact the relevant authorities if:

- you cannot report an incident to your organisation, or
- your internal complaint was not handled properly

## **9. Reporting**

Talk to your line manager or organisation's safeguarding lead ( CAO)



- If you have a concern about modern slavery in your organisation or in your organisation's supply chain, contact your manager immediately. If your organisation has a designated safeguarding lead (DSL), you can discuss your concerns with them.
- Call a helpline for advice  
The Modern Slavery Helpline is available to contact if you need advice or want to report a suspicion. You can call the helpline on 0800 0121 700 or fill out an online form.

There are a few other organisations you can make a report to if you suspect modern slavery:

- Visit your local police station or call the non-emergency line: 101
- Crimestoppers on 0800 555 111
- Gangmasters and Labour Abuse Authority on 0800 432 0804 or by email [intelligence@gla.gov.uk](mailto:intelligence@gla.gov.uk) – this is for concerns related to worker mistreatment

If you want to make a report outside the UK, contact the relevant helpline in that country.

### ***Emergency***

If you believe the potential victim is in immediate danger, call the police on 999.

We may terminate our relationship with other employees, suppliers and any other associates working with us if they knowingly breach this policy.

Signature:

Dated: 11<sup>th</sup> March 2025

Name:

Ian Parris

Position: Chief Executive Officer CEO

Policy Review Board Meeting 11th March 2026