

## Modern slavery transparency statement

Independent Integrity Inspection Limited (*INDEi*) has a zero-tolerance approach to modern slavery and we are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

### Scope

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 (the “Act”). It sets out the steps that the company have taken to prevent modern slavery and human trafficking within its business and supply chains.

### Our Commitment

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 implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

We are therefore continuing to implement appropriate controls across a number of areas within our business, including our supplier policies, contractual processes, training and reporting.

We also believe in the importance of transparency: for our clients, our people and broader society. Our Code of Conduct is entitled “Our Commitment to Quality and Integrity” (Our values culture) and sets out the way we wish to operate both between ourselves, between the company and our clients and, also, between the company and society.

### Our Policies

Business. For Good

As organisations adapt to the complexities of globalisation, a growing strain on natural resources and the environment, the influx of new technologies, use of social media and increased transparency, one thing is clear: a societal approach to business and ethical behaviour is more important than ever. Business. For Good is our global initiative that encourages business leaders to think and act long-term in order to enhance business performance and pursue profit responsibly for the benefit of companies and their stakeholders including the wider society.

## **Employees**

Within our firm we are committed to paying people fairly and properly for the work that they perform.

Our Code of Conduct applies to all staff and contains our standards and values. Strong values have been at the heart of our organisation since its creation. They guide us in our daily actions, providing a common base of values that all employees share and respect.

Our six values include the following three specific values relating to our work and ethos, and how it affects the wider global environment:

Integrity - Ethical and moral rigour guide how we work and assist our clients;

Responsibility - We treat the challenges of our clients as our own and we care about how our work may affect our communities; and

Diversity and respect for individuals - Looking beyond borders and cultural differences, we make respect for the individual the cornerstone of all human relations.

Our standards include the following:

We act with integrity and comply with the law, professional standards and the company's policies and procedures applicable to our work;

We consult when questions of ethics arise;

We speak up when we see or hear of behaviour that causes us concern on ethical grounds or fails to uphold our values. Employees who speak up in good faith are assured that they will not suffer any adverse consequences as a result of their doing so; and

We develop and promote thought leadership on issues of importance to the business, financial communities and wider society, including in the area of human rights.

## **Recruitment**

Our workforce is employed on a permanent basis. Our recruitment processes include direct advertising on our web-site, using reputable agencies, and also direct referrals from staff members. All employees who join the company are subject to checks, including the verification of identity, references and evidence of qualifications where appropriate. Similar checks are also undertaken for contractors.

## **Whistleblowing**

We encourage all our staff, clients and other parties to report any concerns they may have in relation to a risk, malpractice or wrongdoing that affects others such as clients, staff, the firm, suppliers or the public. Our whistleblowing procedure is designed to ensure that people can make disclosures

without fear of retaliation.

### **Further Steps Taken**

In connection with the Act we continue to consider where our business and supply chain is most at risk, including a programme of activities to identify and manage risks arising from modern slavery and human trafficking.

### **Anti-Slavery and Human Trafficking Policy**

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, interns, agents, contractors, external consultants, third-party representatives and business partners. By implementing this policy, the company will be monitoring its use and effectiveness, dealing with any queries about it, and consider internal control systems and procedures to ensure they are effective in countering modern slavery.

The policy states that our zero-tolerance approach to modern slavery will be communicated to suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. In addition, we may terminate our relationship with individuals and organisations working on our behalf if they breach this policy.

**Signed:**

James Bayliss

**Date:**

3<sup>rd</sup> April 2018

**Review Date:**

3<sup>rd</sup> April 2019