

## **Modern Slavery and Human Trafficking Policy**

### **Innovision Global Consulting Limited**

**Date of Issue:** 1 May 2025 **Review Date:** 1 May 2026

#### **1. Policy Statement**

Innovision Global Consulting Limited ("the Company") adopts a zero-tolerance approach to modern slavery, human trafficking, forced labour, and servitude. We are committed to acting ethically, with integrity and transparency in all our business dealings. We are dedicated to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, seconded workers, volunteers, interns, agents, contractors, external consultants, enumerators, third-party representatives, and business partners.

#### **2. Our Business and Supply Chain**

Innovision Consulting is an international advisory and management consulting firm. It provides research, technical assistance and project management services to solve the world's key challenges by working globally with local, national and international partners, non-government organisations, private sector and public sector agencies. It works to ensure better income, jobs, health, education, skills, knowledge, finance, water, sanitation, hygiene and nutrition, empowerment and social inclusion for the people and communities.

As a professional services firm, our supply chain is relatively short and low-risk. Our primary supply chain categories include:

- Professional services partners (associates, consultants, legal, accounting, contractors).
- IT equipment, software, and office services.
- Facilities management (office cleaning, maintenance) for our premises.

Despite our lower risk profile, we recognise that modern slavery can occur in any sector. We are particularly vigilant regarding "hidden" risks in secondary supply chains (e.g., the cleaning staff used by our office providers, enumerators engaged in data collection work in the field or the manufacturing of IT hardware we purchase).

#### **3. Responsibility for the Policy**

The **Chief Executive Officer** 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 **Finance and Administration Manager** 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.

#### **4. Risk Assessment and Due Diligence**

To mitigate the risk of modern slavery in our supply chain, Innovision Global Consulting Limited implements the following due diligence processes:

- **Supplier Adherence:** We expect all suppliers and contractors to adhere to the Modern Slavery Act 2015. For any new material supplier, we require confirmation of their commitment to anti-slavery practices as part of our onboarding process.
- **Risk-Based Approach:** We categorise suppliers based on risk. Higher-risk areas (such as cleaning services, hospitality for events, or branded merchandise) are subject to greater scrutiny.
- **Contractual Clauses:** Where appropriate, we include standard clauses in our supplier contracts requiring compliance with anti-slavery laws and the right to terminate the relationship for non-compliance.
- **Right to Audit:** We reserve the right to request info regarding the anti-slavery policies of our suppliers.

## 5. Recruitment and Employment

We ensure our own recruitment practices are rigorous and compliant with UK employment laws:

- **Right to Work:** We conduct robust checks on every employee's eligibility to work in the UK to safeguard against human trafficking or forced labour.
- **Fair Pay:** We are committed to paying all employees at least the National Living Wage/London Living Wage.
- **Whistleblowing:** We encourage an open culture where employees can raise concerns without fear of reprisal. Our Whistleblowing Policy protects staff who report suspicions of modern slavery.

## 6. Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business:

- This policy is included in the induction process for all new staff.
- Annual reminders and updates are provided to all staff, specifically highlighting how to spot the signs of modern slavery (e.g., physical signs of abuse, lack of identification documents, appearing malnourished or withdrawn).

## 7. Compliance and KPIs

We will measure the effectiveness of our steps to combat modern slavery via the following Key Performance Indicators (KPIs):

- **Staff Training:** 100% of staff acknowledge reading this policy annually.
- **Supplier Vetting:** 100% of new material suppliers vetted for modern slavery compliance before engagement.
- **Whistleblowing Reports:** Prompt investigation and resolution of any concerns raised regarding modern slavery (Target: 100% investigated within 5 working days).

## 8. Breaches of This Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We provide formal notice and may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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### Approved by:

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**Sadruddin Imran** Chief Executive Officer, Innovision Global Consulting Limited

**Date:** 1 May 2025

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### Summary Statement

"Innovision Global Consulting Limited implements a risk-based supply chain management process compliant with PPN 02/23. We require all suppliers to complete a mandatory Modern Slavery Compliance Declaration during onboarding. Our due diligence focuses on high-risk categories (e.g., IT and facilities), supported by contractual right-to-audit clauses, annual staff training, and a zero-tolerance policy towards exploitation."

## Supplier & Associate Onboarding: Modern Slavery Declaration

**Subject:** Supplier Onboarding: Compliance Requirement for Innovision Global Consulting Limited

**To:** [Supplier/Associate Name]

As part of our commitment to ethical business practices and to meet UK Government procurement requirements (PPN 02/23), Innovision Global Consulting Limited requires all suppliers and associates to confirm their adherence to the *Modern Slavery Act 2015*.

Please reply to this email answering the four questions below.

**1. Does your organisation have its own Modern Slavery Policy?**

- Yes (Please attach a copy or a link).
- No (If No, please confirm agreement to Point 2 below).

**2. If you do not have a specific policy, do you confirm that your business strictly adheres to the relevant UK labour laws and will not engage in any form of forced labour, human trafficking, or exploitation?**

- Yes, we confirm.
- N/A (We have our own policy).

**3. Has your organisation (or any of its directors) ever been convicted of an offence under the Modern Slavery Act 2015 or subject to an investigation regarding labour rights violations?**

- No.
- Yes (Please provide details).

**4. Do you take steps to ensure your own suppliers (e.g., equipment, recruitment agencies) are free from modern slavery risks?**

- Yes.
- No.

**Declaration:** I confirm that the information provided is true and accurate to the best of my knowledge.

Name: \_\_\_\_\_ Date: \_\_\_\_\_

### How to Assess:

| Question        | The Ideal Answer   | When to Worry (Red Flags)   |
|-----------------|--|---|
| 1. Own Policy?  | "Yes" is great. "No" is acceptable for freelancers/small firms if they agree to Point 2. | They say "No" and refuse to agree to Point 2.   |
| 2. Confirmation | "Yes"  | If they refuse to confirm compliance with UK law, do not hire them.   |
| 3. Convictions  | "No"   | "Yes" is an immediate disqualification for public sector work.  |
| 4. Supply Chain | "Yes"  | If they say "No" but supply you with high-risk items (e.g., branded merchandise, uniforms, or hardware), ask for more info. If they just provide advice/consulting, "No" is low risk. |