



Modern Slavery Statement

1. Purpose of this Policy

1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out the policy of IESA Ltd with the aim of the prevention of opportunities for modern slavery to occur within its business or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

1.2 As a Business, we have a zero-tolerance approach to modern slavery. 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 businesses or those of our suppliers.

2. Prevention of Modern Slavery

2.1 We are 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, business partners and throughout our entire supply chain, and we are evolving and updating our contracting processes to include specific requirements against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

2.2 All IESA personnel have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employees’ obligations under their contract of employment.

2.3 Whilst recognising our obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:

- (i) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- (ii) introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

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2.4 From April 2016 IESA's Slavery and Human Trafficking Statement is presented on our website and reviewed on an annual basis or when there is a change in law.

3. Responsibility

3.1 Overall responsibility for the prevention of modern slavery rests with the Company's Chief Executive Officer. The Executive Board of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

3.2 Senior Management for all departments are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

4. Reporting of Modern Slavery or Human Trafficking

4.1 Employees are encouraged in all instances to raise any perceived issues with their line manager who will then be able to instigate an investigation.

4.2 All IESA employees are issued with an employee handbook which outlines the whistleblowing policy allowing a defined route to be followed when raising any issues of concern.

Signed on Behalf of IESA Limited

Glenn Timms
Chief Executive Officer

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