

## PURPOSE

This policy ensures that I-Cubed Group Ltd maintains an ethical, transparent, and socially responsible approach to all its business relationships and operations.

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 (“**modern slavery**”), all of which include the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

I-Cubed Group Ltd is committed to preventing modern slavery, human trafficking, forced labour, and other forms of exploitation in its operations and supply chains. This policy outlines our commitment to ensure that modern slavery does not occur within our business, among contractors, clients, and suppliers, and describes the steps we take to mitigate this risk.

This policy applies to:

- **Employees:** Permanent, temporary, and contract staff of I-Cubed Group Ltd.
- **Contractors:** Individuals or organisations providing services on behalf of I-Cubed Group Ltd.
- **Clients:** Those who engage our professional services.
- **Suppliers and Subcontractors:** All entities that provide goods and services to I-Cubed Group Ltd.

We require that clients, customers, partners, stakeholders and suppliers, read and understand this policy and operate within it.

This policy will be shared with everyone and adherence and compliance will be monitored by our Chief Executive Team and will be reviewed on an annual basis or as needed in line with changes to legislation or business processes.

We expect everyone to act within the spirit of this policy while working for or representing I-Cubed Group Ltd.

By engaging with I-Cubed Group Ltd all parties acknowledge their commitment to adhere to this Modern Slavery Policy and to take all necessary actions to prevent modern slavery and human trafficking.

## STATEMENT

As a leading professional services firm, we’re committed to respecting and upholding internationally recognised human rights. We have a comprehensive programme to manage the direct and indirect human rights risk associated with our operations and supply chain. Meeting the legislative requirements of the Modern Slavery Act (2015) our approach draws on the principles of the UN Guiding Principle’s Reporting Framework.

We continue to review and strengthen our approach to human rights issues, including modern slavery, across our operations and supply chain. We are committed to ensuring that there is no modern slavery or human

trafficking in our supply chains or in any part of our business.

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## **COMMITMENT**

The purpose of this policy is to set out I-Cubed Group Ltd's policy on modern slavery. I-Cubed Group Ltd has a zero-tolerance approach to modern slavery within its business and its supply chains.

I-Cubed Group is committed to:

1. Acting ethically and with integrity in all our business dealings and relationships.
2. Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.
3. Ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015.
4. Prohibiting the use of work paid recruitment fees, compulsory overtime, child labour, discrimination, confiscation of identification documents and any act which may directly or indirectly impede freedom of movement, freedom of association, or the freedom of a worker to terminate their employment with I-Cubed Group Ltd.
5. Requiring the same high standards from our Suppliers. Our standard contracts include specific prohibitions against modern slavery and require Suppliers to comply with their own modern slavery policy or I-Cubed Group Ltd's modern slavery policy if they do not have their own policy. We also expect our Suppliers to hold their own suppliers to the same high standards.
6. Identifying modern slavery. There is no typical victim of modern slavery, and some victims do not understand they have been exploited or that they are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery, human trafficking, or forced labour:
  - (a) The person is not in possession of their own passport, identification or travel documents.
  - (b) The person's wages are being paid to a bank account in another name, which may be an indicator of debt bondage or withholding of wages
  - (c) The person is acting as though they are being instructed or coached by someone else.
  - (d) The person is working excessive overtime.
  - (e) The person allows others to speak for them when spoken to directly.
  - (f) The person is dropped off and collected from work.
  - (g) The person is withdrawn or appears frightened.
  - (h) The person does not seem to be able to contact friends or family freely.
  - (i) The person has limited social interaction or contact with people outside of their immediate environment.
  - (j) There are signs of abusive working or living conditions.

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

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## **DUE DILIGENCE PROCESS**

To mitigate the risk of modern slavery, we implement the following due diligence processes:

- **Supplier Vetting:** All suppliers, contractors, and subcontractors are subject to vetting and are required to demonstrate that they have policies and procedures in place to combat modern slavery.
- **Supplier Contracts:** Contracts with suppliers, contractors, and partners include explicit clauses on the prohibition of modern slavery and the need for compliance with this policy.
- **Client Due Diligence:** We conduct due diligence on our clients to ensure that our business relationships do not contribute to modern slavery practices.
- **Regular Audits and Monitoring:** We audit high-risk suppliers and contractors to verify their compliance with ethical labour practices.

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## RESPONSIBILITIES

### Employees and Contractors

All employees and contractors of I-Cubed Group Ltd are responsible for:

- Being aware of the risks of modern slavery in their area of work.
- Reporting any concerns about modern slavery in our operations or supply chain.
- Ensuring their actions do not contribute to modern slavery practices.

### Clients

Clients of I-Cubed Group Ltd are expected to:

- Conduct their operations ethically and in compliance with modern slavery laws and regulations.
- Cooperate with us in promoting ethical labour practices and eradicating modern slavery from their operations.

### Suppliers and Subcontractors

Suppliers and subcontractors must:

- Ensure that their business operations, and those of their own suppliers, are free from any form of modern slavery.
- Provide evidence of compliance with modern slavery laws upon request.
- Cooperate fully with I-Cubed Group Ltd in auditing and monitoring activities.

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## FURTHER INFORMATION

### Training and Awareness

I-Cubed Group Ltd provides ongoing training to its employees, contractors, and key stakeholders on identifying and addressing modern slavery risks. This training includes:

- Awareness of the signs of modern slavery.
- Steps to report suspected cases of exploitation.
- Understanding of legal obligations and corporate responsibilities.

### Reporting Concerns

I-Cubed Group Ltd encourages all employees, contractors, clients, and suppliers to report any concerns related to modern slavery. Reports can be made anonymously, and no one who raises concerns in good faith will face retaliation. Any reports of modern slavery will be investigated promptly and thoroughly.

Reporting channels include:

- **Internal Reporting:** Reports can be made directly to the Chief Executive team.

- **Email Reporting:** [sebastian@i-cubed.co.uk](mailto:sebastian@i-cubed.co.uk)

### **Continuous Improvement**

We are committed to continuously improving our efforts to combat modern slavery through:

- Regular reviews of our policies and procedures.
- Engaging with industry partners, NGOs, and stakeholders to share best practices and stay updated on legal requirements.
- Enhancing our due diligence and risk management processes based on feedback and lessons learned.

### **Compliance and Enforcement**

Failure to comply with this policy may result in disciplinary action, including termination of employment or business relationships. For suppliers and contractors, non-compliance may lead to the termination of contracts and/or legal action. I-Cubed Group Ltd reserves the right to audit or inspect supplier facilities to ensure compliance with this policy.

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### **IMPLEMENTATION OF THIS POLICY**

We will ensure that employees, contractors, clients, and suppliers are made aware of this policy and that it is easily accessible. Any updates or changes will be communicated to all.

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### **ACKNOWLEDGEMENT**

Employees must sign the acknowledgment form to confirm that they have read and understood the Modern Slavery Policy Acknowledgment Form:

I, [Employee Name], hereby acknowledge that I have read and understood I-Cubed Group Ltd Modern Slavery Policy and agree to comply with its terms.

Signed:

Date:

Position: