

Modern Slavery Policy

Policy statement

Any use of slave or trafficked labour is absolutely abhorrent to Infirst. We take the issue very seriously, and we are fully supportive of any measures to eradicate this criminal activity. We acknowledge our responsibility under the Modern Slavery Act 2015 and will ensure transparency within our organisation and with suppliers of goods and services. We will take proactive steps to ensure that there is no modern slavery in our business or in our supply chain.

“Modern slavery” includes:

Hidden labour exploitation, defined as all offences of human trafficking, slavery, forced labour and domestic servitude by a third party individual or gangs other than the employer including rogue individuals working within the wider Infirst operations without the knowledge of management. This can include work related exploitation such as forced use of accommodation. Human trafficking, defined as the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

The purpose of this policy is to provide clarity to all staff and suppliers to Infirst on the Company's standards, processes and actions that it commits to take in order to protect workers from the threat of modern slavery.

Responsibilities

The Infirst Board has responsibility for implementing this policy statement and its objectives. It will provide adequate resources and investment to ensure that modern slavery is not taking place within the organisation or within its supply chains.

All staff responsible for recruitment either directly or via agency providers are responsible for the application of this policy and accompanying procedures.

All staff responsible for purchasing services at Infirst sites and from major suppliers are responsible for ensuring that the supplier commits to adhere to these principles.

Policy commitments

Infirst commits to:

1. 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.
2. Avoid the use of agency labour in our wider business wherever practicable, to ensure that we have adequate control over the conditions under which our staff are engaged.
3. Ensure that employee sourcing and recruitment processes are under the control of trusted and competent staff.

4. Ensure that all staff responsible for directly recruiting are aware of issues around modern slavery and signs to look for. Provide training to staff as appropriate.
5. Accept that job finding fees are a business cost, and must not be paid by job applicants. The Company will not use any individual or organisation to source and supply staff without confirming that such staff are not being charged a work finding fee.
6. Raise awareness by providing information on tackling modern slavery to our staff through a variety of formats including training and awareness through the employee handbook.
7. Encourage staff to report any suspected cases of modern slavery, and provide a confidential means to do so. Information on how to report such cases will be included in the employee handbook.
8. Ensure that all reports of suspected modern slavery are dealt with properly and with sensitivity, and where appropriate are reported to the relevant authorities.
9. As informed by our supplier risk assessment, promote awareness of modern slavery to significant suppliers; include due diligence on the controls adopted by these suppliers to address modern slavery in our approval procedures for significant suppliers; include a commitment to prohibit modern slavery in our contracts with them; as far as practicable monitor the policies and procedures at significant providers of goods and services to Infirst and seek to ensure that they are consistent with these principles.
10. Terminate our contract with any supplier found to have knowingly been involved in modern slavery.
11. Continue to develop this policy and our processes and procedures in line with good practice.

Philip Lindsell
Managing Director
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