

# Modern Slavery Policy

Integra Associates Ltd has a zero-tolerance approach to modern slavery, and 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 business or in any of our supply chains.

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 and we expect the same high standards from all of our contractors, suppliers and other business partners.

This policy applies to all persons working for us or on our behalf in any capacity, including directors, employees all officers, agency workers and external contractors.

The company 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.

The Senior Management Team (SMT) will:

- Ensure all colleagues understand and comply with this policy and are given training on it
- Encourage all colleagues to report concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier to a company Director OR in accordance with our Whistleblowing Policy as soon as possible
- Commit to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chain
- Ensure that all Integra Associates Limited competitive tenders will require all interested parties to provide their modern slavery and human trafficking statements
- Ensure complete transparency within its supplier approval process
- Ensure intervention when required
- Ensure this policy and commitment is reviewed regularly and that it remains published and available

Mark Bloomer  
Managing Director  
8<sup>th</sup> September 2020