



## Anti-Slavery Policy

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### Notes on this policy

Section 54 of the Modern Slavery Act 2015 applies to all commercial organisations which carry on business or part of a business in the UK and have a turnover of £36 million or more per annum. Section 54 can therefore apply to non-UK registered companies.

#### 1. Introduction

This policy ensures that Interm IT complies with Section 54 of the Modern Slavery Act 2015, and sets out the responsibilities for employers and employees.

Interm IT is committed to ensuring that all of its business operations are free from involvement with slavery or human trafficking.

#### Annual statement

Interm IT does not meet the conditions to be required to publish an annual slavery and human trafficking statement. However, we recognise the importance of addressing modern slavery throughout our business operations to ensure that slavery and trafficking are not Identification of any parts of our business and supply chains where there is a risk of slavery or human trafficking take place, and the steps that we have taken to assess and manage the risk.

#### 2. Potential Exposure

In general, Interm IT considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

#### 3. Additional Action Points

- slavery and human trafficking is considered and addressed in our approach to corporate social responsibility;
- ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure;
- carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK;
- ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act;

- appointing a named individual to oversee the compliance with the Modern Slavery Act 2015 (this person is Richard Spragg);
- identifying and addressing any areas of high risk in our supply chain;
- providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking;
- This policy is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year;

- **Date of approval**.....

- **Signed**.....

- **[Insert title]**

- **Date**.....

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