

IPL MODERN SLAVERY POLICY FOR COLLEAGUES

Our approach

IPL has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.

This policy applies to all IPL, Forza and Kober colleagues, contractors and third-party workers.

This policy does not form part of any employee's contract of employment and we may amend at any time.

What is Modern Slavery?

Modern Slavery is a serious crime and gross violation of fundamental human rights. It takes various forms including slavery, servitude, forced and compulsory labor 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.

The most common form of modern slavery in the UK is forced labour. This is when people are forced to work for others under the threat of violence for little or no pay. The victims don't necessarily have to work directly for the offender, they could be employed in a legitimate job with legal working conditions but their wage may be taken by the offender by controlling the victim's bank account.

We expect all of our colleagues, contractors and third party workers to act in a manner consistent with the Asda Statement of Ethics.

Privacy Statement

Privacy or Data Protection Law governs how Personal Information is handled. Whether you want to know how IPL, Forza or Kober treats your Personal Information or how you should treat customer or colleague information, you will find all you need in the Compliance section of Mitrefinch, Forza & Kober colleagues can contact your HR department to request copies of our policies

Corporate Responsibilities

- Ensuring this policy complies with our legal and ethical obligation and that all those under our control comply with it.
- Collaborate with industry experts to identify risk and continuous improvement opportunities within our operations.
- To contribute to Asda's statement every financial year setting out what steps have been taken over the previous 12 months to mitigate and reduce any risk of modern slavery in our business and supply chain. This statement is published on the Asda and IPL corporate website.
- To be vigilant and alert to the potential signs of modern slavery in any part of our business or supply chains.
- To have clear policies and procedures which are aimed at preventing exploitation and protecting our colleagues.
- The cost of recruitment is a business cost and no fee or cost for recruitment must be charged to workers, directly or indirectly.
- To carry out quarterly checks to identify cases of modern slavery on multiple criteria such as, where we are paying multiple colleagues wages into the same bank accounts and carry out an investigation to establish if this may highlight a colleague is a victim of modern slavery.
- We will regularly raise awareness of modern slavery to all our colleagues and provide further tailored training to colleagues whose roles mean they require further specific training relevant to their role.

Colleague Responsibilities

- The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for us or under our control.
- When recruiting, managers must always follow the Recruitment Policy, as our recruitment processes ensures the risks of modern slavery are mitigated.
- Only use approved employment agencies to source labour, ensuring they are appropriately licensed and have a responsibility to protect individuals against slavery and human trafficking and comply with our obligations in relation to modern slavery which is included in the agency service contract.
- Under no circumstances must bribes be accepted to recruit or favor workers.
- All new colleagues must be issued with a contract of employment detailing their statutory rights and entitlements. Managers should support colleagues who require further support to understand their entitlements.
- Be vigilant when completing right to work checks as outlined in the Right to Work Policy.

- The retention of original identity documents belonging to any candidate or colleague (e.g. passports, biometric residence permits etc.) is strictly prohibited. Retention of identity documents can particularly affect international migrants and can result in restrictions on workers' freedom of movement to create and store copies you can temporarily request these documents but make sure they are returned before the candidate leaves an assessment centre/interview or a colleague leaves their shift.
- All operational colleagues are required to clock in and out on the clocking in machine to accurately record time spent performing work. Failure to clock in and out may result in a colleague not being paid correctly. Colleagues should not be required to work any hours for which they would not receive payment. Any colleague who is asked to work off the clock should escalate this to the relevant Senior Manager
- All managers should listen and be approachable to colleagues, if they are told something that might indicate a colleague is in an exploitative situation and may be a victim of modern slavery then they must respond appropriately.

Doing the right thing

Any suspicions or concerns related to modern slavery must be reported immediately to your line manager or a member of your site leadership team.

If you feel you may be a victim of modern slavery and you are not comfortable with talking to your line manager or colleague, you can call any of the following for help and support:

- Asda Ethics – Ethics@Asda.co.uk / 0800 318 405
- The GLAA – 0800 432 0804 / 0115 959 7032
- UK Slavery Helpline – 0800 012 1700
- UK Human Trafficking Centre – 0844 778 2406

Anyone who breaches this policy by engaging in or conspiring to engage in any form of modern slavery will face disciplinary action, which could result in dismissal.