

# ITAB UK MODERN SLAVERY STATEMENT

| Policy Area      | People & Culture          |
|------------------|---------------------------|
| Standard:        | Modern Slavery Statement  |
| Effective from:  | July 2022                 |
| Revision & date: | Version 0.1 July 2022     |
| Document owner:  | People & Culture Director |

This statement has been published in accordance with the Modern Slavery Act 2015 and constitutes our ITAB UK Ltd slavery and human trafficking statement for the financial year.

## Our Commitment

Itab recognises the responsibility that our group share with our suppliers to tackle the growing global issue of Modern Slavery. Itab's commitment to our customers is very clear, we promote a high level of ethical trading both within our business and supply chain; this includes championing better work and working lives.

We wholeheartedly believe that the Modern Slavery Act 2015 is a crucially important development in bettering the lives of our local and global communities and thus we will not trade or partner with any business or organisation which is involved in this shocking practice however remotely or indirectly. This closely parallels our Ethical Trading Policy whereby close compliance monitoring and continuous improvement help drive our business forward.

## Our Business and Supply Chain

Through organic growth and strategic planning ITAB is now one of Europe's leading custom-made shop fitting professionals. As we expand our global presence, we want our employees and business partners to act responsibly guided by our business code of conduct & ethics. This is in correspondence with International Labour Organization's (ILO) Protocol 2014 emphasizing the role of employers and workers against forced labour. Working alongside prestigious suppliers such as "Meridian Metal", "Valspar Powder Coating LTD" and "James Latham" we focus on continuously improving and maintaining our high ethical standards across the supply chain ensuring Human Rights are respected; both internationally and locally. With Clear and well-communicated policies ITAB is ensuring due diligence across both internal and external operations.

## Supply Chain Due Diligence

Our Suppliers - We operate a supplier policy and maintain a preferred supplier list. We conduct due diligence on all suppliers before allowing them to be become a preferred supplier. Our Anti-Slavery Policy forms part of our contract with all suppliers and they are required to confirm that no part of their business Operations contracts at any time should any instances of modern slavery come to light.

We employ warehouse operatives & production operatives who work in our own UK based depots. We work with our direct employees and closely with our suppliers to ensure compliance with our Anti-Slavery Policy.

The management team have overall responsibility for corporate governance, including Anti-Slavery initiatives. We Acknowledge there is a risk of exposure to modern slavery in our supply chain. As part of our commitment to mitigating any risks we have increased our focus within the business by:

- Writing to all our established and new suppliers to remind them of our commitment to the Modern Slavery Act 2015 and that we will not tolerate any breaches of the act by our supply chain.

- Continuing to audit our supply chain with specific emphasis and regular visits, both announced and unannounced.
- We have committed to establish a code of Conduct which we expect all suppliers to sign up to that recognises our standards and is audited regularly.
- Increasing standards of reporting both internally and externally by suppliers to encourage collaboration in following the guidelines of the Modern Slavery Act 2015.

## Policies

As we expand our global presence, we want our employees and business partners to act responsibly. ITAB's Code of Conduct is intended to provide guidance for this purpose. Everyone in the group is required to comply with the Code, including board members and senior executives as well as employees. This also means that we push on our high moral values and expectations on to both our supplies and our customers.

ITAB's Code of Conduct provides comprehensive guidance and, together with corporate governance regulations and the group's policies and guidelines, it is a framework for ITAB's business activities.

*"ITAB supports, complies with and respects international treaties on human rights in our business. We do not tolerate child labour or work carried out under force or threat of force."*

The Code further sets forth the responsibility of every employee to help ensure all ITAB's global activities meet our high standards for behavior, business ethics, and establishes accountability for compliance with law and policy. Indicating the importance of ethical conduct which both directly and indirectly sustains our Corporate Social responsibility (CSR).

The Code also emphasizes the importance for open dialogue across the board including potential violations and concerns. Our HR team operate across all sites to better facilitate and provides confidential reporting/support.

The ITAB Group's Ethical Trading Policy tied to ITAB's Supplier code of code outlines a set of requirements, responsibilities, and ethical sourcing standards in relation to suppliers, as well as our other business partners. Highlighted sections include ITAB's opposition to worker exploitation in any form of forced or bonded labour, slavery, human trafficking, or other harsh or inhumane treatment of labour.

These principles are applied across all levels of ITAB's Supply chain, vendors, and the vendors subcontractors. Each division with the ITAB Group is responsible for the implementation of these standards, which is reviewed annually.

ITAB's requirements are based on internationally accepted standards such as the United Nations Universal Declaration of Human Rights, the UN Convention on the Rights of the Child and applicable ILO Conventions, and legislation in individual countries.

ITAB's code sets labour practices for a diverse workplace that provides a safe and healthy environment exceeding local law standards. ITAB operates at a global scale and as such these policies would be enact equal to or surpass local standards.

## Taking Action

We expect our employees to fully observe and adhere to ITAB's policies and procedures. We will be adapting and re-promoting our existing corporate policies to incorporate modern slavery and human trafficking issues, including our whistleblowing policy which allows employees to report any concerns confidentially.

Sustainability has been at the forefront of our Group's activities led by our parent company on all levels of operations; encompassing measures related to Human rights and ethical standards.

People orientated legislations drive our group's KPIs to help cultivate ITABs development and keep us at the frontlines of innovation in both the workplace and with our customers.

Modern slavery is a major issue that affects the workforce globally and as such we equip all our team with the necessary knowledge with our day one documentations; ensuring awareness, identification and reporting procedures are clear.

### **Awareness and Training**

ITAB strive to always act with integrity and transparency, and we operate a number of internal policies to assist in safeguarding against human rights infringements including Anti-Slavery policy, Recruitment policy, Whistleblowing policy, Code of Conduct, Health & Safety policy, Harassment and Bullying Policy, Equal Opportunities policy and Disciplinary policy.

Our whistleblowing policy, as mentioned above, encourages employees to report any unethical practices either Internal or external to the business including suppliers. All reports are taken extremely seriously and are fully investigated.

Coaching, teaching, and motivating people internally and externally is critical to the development and success of our programme in preventing and detecting modern slavery by sharing our expertise we are committed to help the ending of modern slavery.

### **Performance Monitoring**

We recognize that the risks from modern slavery change, and as such our approach to preventing modern slavery are reviewed annually.

This approach will monitor and review:

- Staff training programs
- Assessment programs (where applicable); and
- Reporting and escalation processes.

### **Assessment of Effectiveness**

Itab knows that the commitment to a zero-tolerance policy to human rights abuse is a continual journey and we will continue to assess the effectiveness of our program through internal and external audits.

This Statement is made to the legal requirements of the United Kingdom.

On behalf of ITAB,



Simon Shankster

Vice President ITAB UK