

**IAN ROUTLEDGE CONSULTANCY
ANTI SLAVERY POLICY – ISSUE 1.0 3 OCTOBER 2017**

1. Introduction

- 1.1. The Ian Routledge Consultancy Ltd (IRC) values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the firm's staff as well as others acting on the firm's behalf are key to maintaining these standards.
- 1.2. The purpose of this document is to set out the firm's policy in relation to modern slavery. The policy applies strictly to all directors, employees, subconsultants and suppliers of IRC.

2. Modern Slavery

- 2.1. This policy is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that IRC has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.
- 2.2. Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, IRC accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

3. IRC Policy

- 3.1. IRC has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our own supply chain.

4. Breach of Policy

- 4.1. Any director or employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.
- 4.2. IRC may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

5. Employee responsibility and how to raise a concern

- 5.1. The prevention, detection and reporting of modern slavery is the responsibility of all IRC staff. If you become aware or suspect that an element of modern slavery is proposed or has taken place, then you have a duty to report this to the responsible director.
- 5.2. The IRC director responsible for IRC's anti slavery policy is Ian Routledge.

A handwritten signature in black ink, appearing to read 'Ian Routledge', with a large, stylized initial 'I'.

Ian Routledge
Responsible Director
03 October 2017