

## **MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT**

### **1. Policy brief & purpose**

Impact Innovation & Growth Services Ltd (hereby known as Impact) is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and or similar human rights abuses.

We are also committed to ensuring our approach to tackling modern slavery in our own business and throughout our supply chains is consistent with our disclosure obligations under the Modern Slavery Act 2015. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

This statement sets out Impacts actions to understand all potential modern slavery risks related to the business and to ensure steps are maintained to prevent both slavery and human trafficking.

### **2. Actions**

To assess the risk of modern slavery, we use the following processes:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains
- Review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.
- Protect whistle blowers.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

### **3. Training**

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business our Modern Slavery Policy is included in our Employee Handbook.

We provide training to all members of staff, and this has been incorporated into our induction programme.

### **4. Disciplinary Consequences**

All principles described in this policy must be strictly followed. A breach of guidelines will invoke disciplinary and possibly legal action.

## 5. Reviewing our Data Protection Policy

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Impact's slavery and human trafficking statement. Impact is committed to continuous improvement and this policy will be reviewed regularly (once a year) for effectiveness and updated when required.

The person responsible for managing this Modern Slavery Policy Statement is **Katharine Notley** and she is supported by The Board of Directors. We commit to providing this policy to all staff and associates and displaying it in our business for our clients.

Signed: .....

Date: .....

**David Notley**  
**Managing Director**

**Issue Date: October 2021**  
**Review date: November 2022**