

ILF CONSULTING ENGINEERS UK LIMITED

MODERN SLAVERY ACT – GROUP POLICY INTRODUCTION

29.01.2024

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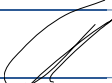


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REVISIONS

					 Ramakrishnan, Chandrasekhar 2024.01.29 15:01:19 +01'00'
0	29.01.2024	First Issue	MKS	C. Rama- krishnan	H. Fassi  <small>Digitally signed by Helmut Fassi DN: cn=Helmut Fassi, c=DE, o=ILF Group Holding GmbH, email=helmut.fassi@ilf.com Date: 2024.01.29 13:58:42 +01'00'</small>
REV.	DATE	ISSUE, MODIFICATION	PREPARED	CHECKED	APPROVED



Policy Statement

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, 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. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

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

Responsibility for the Policy

Dr Chandrasekhar Ramakrishnan, Managing Director of ILF Consulting Engineers UK Limited, is responsible for ensuring ILF Consulting Engineers UK Limited and its employees and suppliers comply with their obligations under this policy at UK level.

Helmut Fassel, Chief Risk Officer of ILF Group Holding has overall responsibility for ensuring that all ILF Group companies are compliant with their legal and ethical obligations at Group level.

Dr Chandrasekhar Ramakrishnan has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to

ensure that they are effective in countering modern slavery, with oversight from Helmut Fassel.

Management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy, and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the compliance manager.

Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business, or supply chains of any supplier tier, at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred, or that it may occur, you must report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is, or may be, taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment,

you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which is available from the Company.

**Communication
Awareness of this Policy**

& Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided, as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them, and reinforced as appropriate thereafter.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf, if they breach this policy.

