



DELIVERING TRACEABILITY,
VISIBILITY, EFFICIENCY
& PATIENT SAFETY

Modern Slavery and Human trafficking statement

Document Name:	Modern Slavery Policy	Document Ref No:	N/A
Document Type:	Guidance & Plan	Version No:	3
Document Owner:	Director of Operations, Development & Service Delivery	Issue Date:	March 2025
Document Author:	HR Manager	Classification	Public

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1 Purpose, Scope and Users

Ingenica Solutions does not fit within the public reporting criteria for modern slavery statements. However we have voluntarily prepared a statement as we feel this is important and are full committed to eradicating modern slavery practices within the UK and globally.

The purpose of this document is to establish and facilitate the development of controls that will aid the detection and prevention of modern slavery and human trafficking within our organisation, our customers and business partners. The intention is to promote consistent cultural behaviour by providing guidelines and assigning responsibility for the development of controls and conduct of any assessment, review and investigation.

This policy applies to any instance, or suspected instance involving employees as well as board members, consultants, contractors, suppliers and any other parties with a business relationship with our organisation. Any investigative action required will be conducted without regard to the suspected wrongdoer's length of service, position or relationship to the company.

Users of this document are all employees of our organisation.

2 Reference Documents

- Employee Handbook
- Management of External Providers

3 Definitions

See Terms and Definitions Register.

4 Modern Slavery

Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation, including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting.

The most common form of modern slavery is human trafficking, which includes the use of violence, threats or coercion to transport, recruit or harbour people to exploit them for purposes such as forced prostitution, labour, criminality and marriage.

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The Modern Slavery Act is a globally leading piece of legislation, which sets out a range of measures on how modern slavery and human trafficking should be dealt with in the UK. While not all the Act is directly relevant for business, section 54, titled 'Transparency in supply chains' impact on the corporate sector. As a consequence, major clients require commitment from their supply chain.

4.1 Background

All businesses are under a legal obligation to be able to check and verify the robustness of their supply chains. It is imperative, especially given the Modern Slavery Act 2015, that businesses consider supply chain risks as part of their enterprise-wide business models.

There is always scope for inappropriate behaviour where people and processes are involved, and our stance is that these vulnerabilities should be considered as part of risk modelling to protect human rights as part of the overall risk management strategy.

Modern slavery is a form of organised crime in which victims are treated as commodities and exploited for criminal gain. The victims of modern slavery come from all walks of life and can be found all over the globe. They are often unwilling to come forward to law enforcement or public protection agencies, which means it is becoming increasingly important for commercial organisations to take a proactive role to ensure that slavery and human trafficking is not taking place within their businesses or any related supply chains.

In the UK Modern Slavery Act 2015, the government solidified this need by introducing an important new provision focused on transparency. The provision requires commercial organisations of a certain size (above £36 million turnover) to publish an annual slavery and human trafficking statement beginning in 2016. The statement must include a report of the steps taken during the past financial year to ensure that these human rights violations are not taking place in any part of a business or its supply chains.

4.2 Our Commitment

- As an organisation we do not meet the reporting criteria currently for Modern Slavery, we also do not have a large supply chain in place to operate our business. We have therefore voluntarily produced this statement to show our commitment to tackling the issues of modern slavery within our suppliers and to provide reassurance to our customers, suppliers and other interested stakeholders.
- We are committed to the highest level of ethical standards and sound governance arrangements and set high standards of impartiality, integrity and objectivity in relation to the management of our activities.
- We adopt zero tolerance to modern slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts.

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- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- Our key and main supplier is a member of the RBA Responsible Business Alliance (Zebra Technologies) providing wider reassurance of our partner’s global supply chain commitment.
- We fully support the government’s objectives to eradicate modern slavery and human trafficking.
- If we discover other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.
- Our Whistleblowing Policy provides the reporting line we should take when identifying an issue. Beyond this, if we suspect that modern slavery or human trafficking is happening near us, we can call the Modern Slavery helpline on 0800 0121 700 or complete the Modern Slavery Helpline Form here: <https://modernslavery.co.uk/contact.html>

4.3 Activity and Measures

Managing modern slavery risks involves activities across various areas. Few companies can implement mature, detailed activities across all areas, but we will endeavour to address these areas:

- Risk Assessment: Performing risk assessment on set up for all our supplier relationships
- Relationships: Strengthening our supplier engagement understanding our partners and suppliers
- Training: raising awareness and guidance amongst our team of Modern Slavery and how to report and to whom any activities they are concerned about
- Continue to review internal process and procedures maintain and updating links to modern slavery during management reviews.

5 Validity and Document Management

This document is valid from approval date on title page.

The owner of this document is Director of Operations, Development & Service Delivery, who must check and, if necessary, update the document at least once a year.

When evaluating the effectiveness and adequacy of this document, the following criteria need to be considered:

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- Number of incidents relating to subject
- Employee awareness and engagement in subject
- Changes in client requirements related to subject
- Changes in legal, regulatory, contractual and other requirements

6. Sign Off

This Modern Slavery Statement has been reviewed and signed off by the board of directors (or equivalent management body).

Signed by Document Owner

M Rich

Signed: Mike Rich Approved *Michael Rich*

Michael Rich – Director of Operations, Development and Service Delivery

Tue, 18 Mar 2025 15:26:31

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Appendix 1 – Modern Slavery Statement

Our statement is made in accordance with section 54 of the Modern Slavery Act 2015.

We operate several internal policies to ensure we are conducting business in an ethical and transparent manner. These include our Modern Slavery and Human Trafficking Statement, our Recruitment Policy, Whistleblowing Policy and our Code of Conduct.

We conduct external supplier assessment before they become active. We also require that suppliers confirm to us that:

- a) They have taken steps to eradicate modern slavery within their business
- b) They hold their own suppliers to account over modern slavery
- c) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- d) We may terminate the contract at any time should any instances of modern slavery come to light

We continue to raise awareness amongst employees of Modern Slavery, so our team can report any incidents they become aware of in a timely manner.

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Appendix 2 - Awareness Infographics

MODERN SLAVERY

MODERN SLAVERY IS CLOSER THAN YOU THINK

VICTIMS ARE EXPLOITED IN LABOUR, PROSTITUTION AND DOMESTIC WORK

Victims of Modern Slavery are often trafficked and through fear or coercion, forced to work for little or no money. Sometimes, victims are sexually exploited or forced to commit crimes.

Slavery is closer than you think. It happens all over the world including the UK.

If you are a victim or know someone who might be visit modernslavery.co.uk or to seek help or report concerns call the helpline.

0800 0121 700

Calls are free from landlines and most mobile networks.

HELP FREE THE UK FROM MODERN SLAVERY

Modern Slavery is the legal exploitation of people for personal or commercial gain. Victims* are trapped in servitude, which they were deceived or coerced into, and feel they cannot leave.

MODERN SLAVERY INCLUDES:

- SEXUAL EXPLOITATION
- CRIMINAL EXPLOITATION
- FORCED LABOUR
- DOMESTIC SERVITUDE

17% INCREASE IN VICTIMS SINCE 2015

JUST OVER 1 OF 3 VICTIMS ARE CHILDREN

JUST OVER 1 OF 2 VICTIMS ARE FEMALE

SEXUAL EXPLOITATION

34% ARE CHILDREN AT REFERRAL

22% ARE CHILDREN AT REFERRAL

41% VICTIMS OF LABOUR EXPLOITATION

84% MALE

26% CHILDREN

COMMON AREAS OF LABOUR EXPLOITATION

- FOOD PROCESSING
- FACTORIES
- CONSTRUCTION
- CAR WASHES
- AGRICULTURE
- FARMING

JUST OVER 1 OF 10 A VICTIM OF DOMESTIC SERVITUDE

24% VICTIMS

34 PEOPLE FORCED INTO MONETARY FRAUD IN THE UK

EXPLOITERS FORCE VICTIMS TO CLAIM BENEFITS ON BEHALF OF THE VICTIM TO GET INTO THE UK, BUT THE VICTIM IS FORCED TO TAKE OUT LOANS OR CREDIT CARD DEBTS

CANNABIS CULTIVATION IS THE HIGHEST FORM OF CRIMINAL EXPLOITATION

33% OF THOSE ARE CHILDREN

WHERE VICTIMS COMMONLY COME FROM

UK CITIZENS ARE ALSO VICTIMS

ALBANIA, ROMANIA, CHINA, VIETNAM, NIGERIA

MODERN SLAVERY IS HAPPENING ACROSS THE UK

Slavery is closer than you think. It happens all over the world including the UK. Find out more at modernslavery.co.uk or to seek help or report slavery call the helpline.

0800 0121 700

Calls are free from landlines and most mobile networks.

All data is drawn from National Referral Mechanism statistics 2016. This infographic incorporates data from all licensed sections of exploitation. *Victims referred to above are potential victims identified and referred to the National Referral Mechanism, who are then subject to further assessment.

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