

# Modern slavery policy

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# Modern slavery policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. All of these have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

THG Ingenuity has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and working relationships. We will implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring 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 will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. We expect that our suppliers will hold their own suppliers to the same high standards.

The policy applies to all persons working for us or on our behalf in any capacity, including but not limited to Directors, Managers, Agency Workers, Seconded Workers, Volunteers, Interns, Contractors, External Consultants, Third-Party Representatives and Business Partners.

This policy and procedure does not form part of any employee's contract of employment. THG Ingenuity reserves the right to amend and/or not apply this policy and procedure at any time.

## Monitoring and review

Issue	Issue Date	Author	Revision Notes	Approver
1	June 2026	Human Resources	Policy Review	People Director