MODERN DAY SLAVERY POLICY

IPM Facilities Ltd
15 Highview Business Centre
Bordon, Hampshire, GU35 0AX

0800 078 6279
hello@ipmf.co.uk

No 04135159 **VAT** GB755195017

POLICY STATEMENT

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 which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

IPM Facilities Ltd has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships.

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 and we expect that our suppliers will 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, contractors, external consultants, third-party representatives, and business partners.

COMPLIANCE WITH THIS 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 chain is the responsibility of all those working for us or under our control. You must notify your 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 part of our business or supply chain at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it 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 or the Compliance Officer.

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

SUPPLY CHAINS

IPM are committed to respecting the rights of workers throughout our business including our supply chains. An approved supplier list is kept and maintained to ensure compliance throughout the entire workforce.

We commit to the following practices:

- There is no forced, bonded, or involuntary prison labour; workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave after reasonable notice.

- Working conditions are safe and hygienic – in accordance with the current knowledge of the industry and specific hazards. Risk assessments and safe methods of working are in place and adequate steps are taken to prevent accidents and injury to health Slavery & Human Trafficking Statement at work. Workers must receive regular and recorded Health and safety training and have access to clean toilet facilities and potable water.
- Child labour shall not be used
- Living wages are paid and all workers are to be provided with written and understandable information relating to their employment conditions, including rate and timing of pay.
- Working hours are not excessive – compliant with national laws and regulations.
- No discrimination is practiced – in relation to hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation.
- Regular employment is provided – to every extent possible work performed must be on the basis of a recognised employment relationship established through national law and practice.
- No harsh or inhumane treatment is allowed – physical abuse or discipline, the threat of physical abuse, sexual or other harassment, verbal abuse, or other forms of intimidation shall be prohibited.

In addition, we seek confirmation from our suppliers and subcontractors that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. We may terminate the contract at any time should any instances of modern slavery come to light Our supply chain is primarily UK-based with the remainder being EU suppliers. These remain generally recognised as being at lower risk of Modern Slavery issues.

DUE DILLIGENCE

IPM's onboarding procedure follows the Home Office guidance. Right-to-work checks are conducted to ensure that our employees are lawfully in the UK and have the right to work. Action is taken if any issues are identified

In addition, we have introduced a more robust sub-contractor questionnaire to assess our supply chain in terms of compliance with the Modern Slavery and Human Trafficking Act 2015, both in the tender process and ongoing.

MEASURING EFFECTIVNESS

With the application of our internal policies and procedures, we remain confident that our direct workforce is free from slavery and human trafficking. The measures that we have in place regarding our supply chain due diligence will over time demonstrate that we are fulfilling our obligations. We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if: No validated reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified, which we could have identified from our processes and procedures. Over the past 2 years, we have not identified any breaches of the Act or our Code of Conduct in either our direct workforce or our supply chain.

COMMUNICATION AND AWARENESS OF THIS POLICY

Awareness of this policy, and of the risk business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us. Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

IPM Facilities Ltd
15 Highview Business Centre, Bordon, Hampshire, GU35 0AX
0800 078 6279 | hello@ipmf.co.uk

Signed:

Mark Noakes – CEO
11 December 2025