



MODERN SLAVERY POLICY

This policy has been made in accordance with section 54 of the Modern Slavery Act 2015. The policy outlines the steps the ImageData Group has taken during the financial year to ensure slavery and human trafficking is not taking place within any part of our business or within our supply chain. Modern slavery is a crime and a violation of fundamental human rights. Modern slavery 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 to exploit them for personal or commercial gain.

The ImageData Group is committed to social and environmental responsibility and has zero tolerance towards any form of modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and ensuring modern slavery is not taking place within our own business or our supply chains. The group only uses approved suppliers who we require to be fully transparent with strict requirements placed on labour conditions. Suppliers who hold recognised accreditations affiliated to these principles are preferred.

Specifically, the policy of the group can be further defined as below:

- a) The ImageData Group is committed to respecting internationally recognised human rights and continually develops its operations in alignment with the Un guiding principles on business and human rights (UNGP).
- b) Image Data Group's policies and code of conduct requirements sets the standards for behaviour.
- c) The code of conduct for suppliers sets the requirements for our suppliers in terms of compliance with applicable legislation, ethical business, sustainability, and human rights as well as actions against bribery and corruption.
- D) The CEO acknowledges her role and responsibilities in the provision of active support, guidance, and leadership in maintaining a progressive policy.
- E) Existing approved suppliers and new approved suppliers will have to be committed to the ImageData Group code of conduct, and will be subjected to a self-assessment questionnaire based on the IDG code of conduct.

- F) We understand that Modern Slavery risk is not static and that further risk mitigation activities through the use of training, education and mentoring the fundamentals of this policy will be upheld by the competency of the staff the group employs.
- H) The Policy will be audited for content and effectiveness through the management of Human resources by the Human Resources manager and auditing of the IMS system by the SHEQ Manager Tony Coulthard.

Responsibility for the Policy

ImageData Group has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Imagedata group has primary responsibility implementing this policy monitoring its use and effectiveness , dealing with any queries, and auditing internal control procedures to ensure they are effective in countering modern day slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are aware of the issue of modern slavery in supply chains.

Compliance with the Policy

You are encouraged to 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 are required to avoid any activity that might lead to, or suggest, a breach of this policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chain immediately. Report any breach in accordance with our Whistleblowing Policy.

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.

Communication & Awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, form part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you. 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.

This policy has been reviewed and approved by the Board of Directors.

Name: Helen Birkin

Title: CEO

Dated: May 2022

Signed.....
