



## Incredible Husk™ International Group

### Anti-Slavery Policy

#### Contents

Policy Definitions.....	1
Policy Statement.....	2
Policy Responsibility.....	2
Policy Compliance.....	3
Policy Communication.....	3
Policy Breaches.....	3
Policy Review.....	4
Policy Jurisdiction.....	4

#### Policy Definitions

References in this policy to “we”, “us” and “our”, is The Incredible Husk International Group, References to “you” and “your” are to those responsible for complying with the policy, as set out in Paragraphs below.

Modern Slavery: is a term used to encapsulate offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and; human trafficking.

Slavery and servitude: is defined here as where people are dehumanised, treated as a commodity, bought or sold as “property”, have restrictions placed on their freedom or are generally exploited for someone else’s gain. Slavery often involves Forced or Compulsory Labour.

Forced or Compulsory Labour: is defined here as where someone is forced to work, or is otherwise controlled by an “employer”, through coercion, mental or physical abuse, or the threat of abuse.

Human trafficking: is defined here as it relates to arranging or facilitating the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.

## **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 to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to the implementation and enforcement of effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chain activities.

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 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 and require 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, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers and business partners, all of whom have a duty to comply with this and other policies designed to prevent modern slavery.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **Policy Responsibility**

The Chief Executive Officer (CEO) of The Incredible Husk International 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.

Responsibility for updating the policy and for producing an annual statement is that of the CEO

Responsibility for ensuring the policy is implemented is that of the CEO. The CEO or a nominated Officer of the company will take responsibility for monitoring risk in all areas outlined above within all areas of company operations and in their supply chains.

Management at all levels are responsible for ensuring those staff 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.

## **Policy Compliance**

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 the CEO, the designated Officer of the company or the confidential Whistleblowing helpline or [compliance@inc-husk.com](mailto:compliance@inc-husk.com) as soon as possible if:

- you believe or suspect that a breach of this policy has occurred or may occur in the future
- you have any concern or suspicion that may be an issue in respect of modern slavery in any – part of our business, or within the supply chains of any third-party suppliers; and / or
- you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our own business or any part of our supply chains constitutes any of the various forms of modern slavery.

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 no one suffers any detrimental treatment by reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our 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 in line with our Grievance-policy

## **Policy Communication**

Awareness of this policy, and 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.

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.

## **Policy Breaches**

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.

**Policy Review**

This policy is reviewed by the managing director or designated Officer of the company annually or when a change takes place.

**Legal Jurisdiction**

This document and all policies contained therein is formed in the UK and unless otherwise stipulated in writing is subject to the jurisdiction of the English Courts.

Signed: Keith Ridgeway

Date: 20th April 2021

Chief Executive Officer