



MODERN SLAVERY ACT 2015 STATEMENT

Introduction

This statement sets out International Group Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at managing the risks relating to modern slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1st January 2019 to 31st December 2019 and includes International Group Limited and its direct subsidiaries.

We operate across a range of industries including health, construction, property development, leisure and hospitality. A full description of the business and services we offer can be found on our [website](#). We have relationships with a large number of suppliers and sub-contractors and a number of their employees will be working at our office locations and on our sites, in addition to our own employees. We also rely on a number of manufacturers, suppliers and distributors which, in turn, will source products from their respective supply chains.

Countries of Operation

- International Group Limited (Parent Company) – UK and worldwide
- Stoke Park Limited – UK
- International Hospitals Group – UK and worldwide

Our Policies

International Group and its subsidiaries have a number of policies that are designed to manage the risks relating to modern slavery and human trafficking, including the Employee Code of Conduct, Responsible Procurement Policy and Anti-slavery and Human Trafficking Policy. These set out our position of zero tolerance of modern slavery and human trafficking in any form in our business and supply chain. We are committed to acting ethically and with integrity in our business dealings and relationships and to maintaining systems and controls designed to ensure modern slavery and human trafficking are not taking place in our business or across our supply chain.

Our Whistleblowing Policy provides a mechanism for our employees and others working in our supply chain to report suspected breaches of these policies. We are aware that risks arising from modern slavery and human trafficking can apply anywhere in our business, whether through direct employment, sub-contracted employees or the supply of goods and materials. We expect our suppliers and subcontractors to ensure that there is no slavery or human trafficking in their supply chain. Where issues are identified (including through our audit process) that are not resolved to our satisfaction, we review the on-going nature of the relationship with that relevant organisation.

Our Approach to Assessing and Managing Risk

1. We have a Group-wide policy confirming our zero tolerance of modern slavery and human trafficking.
2. Our policies require that our sub-contractors and suppliers acknowledge their responsibility for adhering to our policies.
3. We have undertaken surveys to identify the key risks in our supply chain and review these regularly.
4. We have issued minimum procurement standards for certain, high risk categories of materials and products. We keep these standards under review.



5. Our contractual terms include obligations on our sub-contractors and suppliers to comply with our policies, including our Anti-slavery and Human Trafficking Policy.
6. Our policies require our subcontractors and suppliers to complete a survey to confirm that they comply with our zero tolerance policy.
7. We undertake checks on new recruits to ensure that they are eligible to work in the relevant country of employment.
8. We have commenced training to key employees, consultants and contractors on the risks of modern slavery and human trafficking and our processes to mitigate these.
9. We continue to monitor the effectiveness of our actions against the risk of modern slavery and human trafficking. This includes reviewing our policies and our procurement standards and implementing an audit programme (see below).
10. We will organise audits of certain key supply chain partners to understand and validate the controls in their organisations and provide an opportunity to learn from best practice.

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking. Next steps will include:

- Continuing to develop further standards to support our Anti-slavery and Human Trafficking Policy (and related policies).
- Keeping our pre-qualification standards for the appointment of new suppliers and subcontractors under review.
- Continuing to train employees on identifying any potential issues within our operations and supply chain.
- Updating the assessment of risks of modern slavery in our business and our supply chain.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes International Group's modern slavery and human trafficking statement for the financial year ending 31 December 2019. It was approved by International Group's board of directors on 19 February 2020. Signed on behalf of the board of directors by Chester King, Chief Executive, International Group Limited.

Board Approval

This statement was approved on 19 February 2020 by the organisation's board of directors, who review and update it annually.

Chester King
Chief Executive
International Group Limited
19 February 2020