

Modern slavery and human trafficking policy statement

ISG

Introduction

This document contains ISG's policy on modern slavery and human trafficking and its statement under s.54 of the Modern Slavery Act 2015.

Policy

Forced or compulsory labour, human trafficking and other kinds of slavery represent some of the gravest forms of human rights abuse in any society. We all have a responsibility to be alert to the risks in both the ISG business and our supply chain.

ISG is committed to conducting all aspects of its business in an ethical and transparent manner. We acknowledge our duties and responsibilities under the Act.

ISG values require that all workers are treated with dignity and respect. We are fundamentally opposed to slavery, human trafficking, forced labour, debt bondage, the sale or exploitation of children and all exploitative practices in the workplace.

ISG requires that all contractors and suppliers do not engage in any such practices, and do not knowingly themselves contract with third parties which do.

ISG values require that it terminates business relations with any contractor or supplier found to be in breach of anti-slavery and human trafficking obligations.

Modern slavery statement

This statement sets out the approach that ISG plc and its subsidiary companies have either already taken during the financial year to 31 December 2017, or intend to take during the current financial year, to prevent modern slavery and human trafficking in its business and supply chains.

We are seeking to apply the policies and procedures detailed in this statement across relevant parts of the group but acknowledge it may take time to achieve consistent standards, especially overseas and within our supply chains.

Our business

ISG is a dynamic global construction services company. Our people specialise in fit out, technology, construction and development and are dedicated to delivering places that help people and businesses thrive.

With a worldwide turnover of c. £1.7 billion for the financial year ended 31 December 2017, and an

employee base of just under 3,000, we have operations in 20+ countries. Our operations are predominantly based in the UK but we also have businesses in Europe, the Middle East, Asia and Brazil. We are also in the process of entering the U.S. market as part of our overall expansion plans.

Organisational structure

ISG has historically been managed on a decentralised basis. However, in the more recent history of the group, various changes have been made to centralise certain key functions and to better align each of the group businesses.

ISG employee overview

We are committed to providing a great place to work and this is at the heart of our business strategy. We comply with local minimum age and wage laws and do not employ child labour.

All our employees are:

- paid by bank transfer; we do not allow payment to be made into third party bank accounts, thus minimising the risk of forced or compulsory labour; and
- vetted for the right to work in the country where they are employed. Where employees require a work permit/VISA we ensure they have the necessary documentation in place.

As a responsible employer, we take the welfare of our employees seriously. Our whistleblowing policy encourages employees to report wrongdoing (including exploitation) in any form.

Supply chain overview

The ISG business model means that we work in partnership with a large number of sub-contractors and other suppliers to fulfil our commercial and contractual obligations to our customers.

In common with many companies operating in the construction industry, our supply chain is complex; there are often many tiers of suppliers between ISG (as the main contractor) and the source of the raw materials and labour we use.

We have adopted, or are in the process of adopting, various procedures to ensure that both our existing and potential supply partners understand our values, standards and requirements regarding the prevention of modern slavery and human trafficking within supply chains.

We are aware that the biggest slavery and human trafficking risks for ISG lie in our supply chains, particularly the supply chains of our sub-contractors in higher risk jurisdictions.

As part of our sub-contractor due diligence procedures, we are in the process of incorporating an additional section into our vetting process. In the UK, potential new sub-contractors are required to sign up to our 'anti-slavery and human trafficking supply chain commitment' (the "**Supply Chain Commitment**"), as part of the sub-contractor approval process. A copy of our Supply Chain Commitment can be found on ISG's website at www.isgplc.com.

It is our intention that ISG approved contractors will progressively be required to sign up to our Supply Chain Commitment.

In addition to our UK approved sub-contractors, we also work with a large variety of other suppliers both in the UK and overseas. Where relevant, consideration is being given as to how we can efficiently incorporate them into our Supply Chain Commitment processes.

On-site awareness

An update on modern slavery and the various issues to be aware of is now included in our UK on-site induction training and induction paperwork. We are in the process of considering the introduction of similar processes elsewhere within our business.

Training

Relevant employees within the group (to include those working in supply chain, procurement, human resources, health & safety and senior on-site roles) are required to complete a modern slavery and human trafficking e-Learning training course. This course covers the requirements of the Act, ISG's obligations, our supply chain expectations and the potential consequences for non-compliance.

Some parts of our supply chain are also encouraged to subscribe to classroom and e-Learning modules run by the Supply Chain Sustainability School (of which ISG is a partner), which includes matters relating to modern slavery and human trafficking and the risks they need to be aware of.

Ongoing review

We will continue to review and evolve our anti-slavery and human trafficking policies and procedures over time, as we gradually make

progress in the adoption of a common approach throughout our global businesses.

Failure to comply

A failure to comply with the Act, and/or this policy statement will be deemed to be a material breach of the terms of our standard commercial agreements and contracts of employment.

This statement is made pursuant to Section 54(1) of the Act and constitutes ISG plc's slavery and human trafficking statement.

Approved by the ISG plc Board of Directors on 25 January 2018.

For and on behalf of ISG plc

Signed:



Paul Cossell
Chief Executive

Date: 25 January 2018