



Global Policy

Modern Slavery

REF: MS-2025 v2

Approved by: Alex d'Esterre – Global HR Director

Next Review Date: March 2026

1. Introduction

ICG Medical is committed to eradicating modern slavery and human trafficking in all its forms across our business and supply chains. As a global healthcare recruitment leader, we recognise our role in protecting human rights and ensuring ethical treatment of all workers. This policy supports our compliance with the UK Modern Slavery Act 2015 and global labour standards.

2. Purpose

This policy outlines our approach to identifying, preventing, and addressing risks of modern slavery and exploitation. Our focus areas include:

- **Worker Safeguarding** – Ensuring fair recruitment, safe working conditions, and protection of vulnerable workers.
 - **Supplier Accountability** – Strengthening supplier due diligence, compliance, and transparency.
 - **Employee Training** – Equipping staff to identify and report signs of exploitation.
 - **Risk Monitoring** – Ongoing assessments across our global operations and supply chain.
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3. Scope

This policy applies to all ICG Medical employees, contractors, subsidiaries, and business activities worldwide, including:

- **Direct Recruitment** – Screening, onboarding, and management of temporary and permanent healthcare staff.
 - **Third-party Agencies & Suppliers** – Agencies introducing candidates or providing services.
 - **Operational Practices** – HR, procurement, legal, and commercial activities globally.
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4. Modern Slavery Commitments

4.1 Fair Recruitment & Employment

- All workers must have the legal right to work and must not be coerced or deceived in the recruitment process.
- Every employee must be issued a clear, lawful contract of employment in a language they understand.
- Workers must be free to leave employment with appropriate notice, and wages must not be withheld unfairly.

4.2 Supplier Engagement & Due Diligence

- All suppliers must adhere to ICG Medical's Supplier Code of Conduct, which includes anti-slavery and human rights clauses.
- Regular supplier risk assessments and audits will be conducted based on geography, industry risk, and business impact.
- High-risk suppliers will be subject to enhanced monitoring and compliance expectations.

4.3 Awareness & Training

- All staff receive modern slavery awareness training during onboarding and periodically thereafter.
- Specialised training is provided to compliance teams and those involved in recruitment, supply chain, and procurement.
- Posters, policies, and guides are readily accessible to all employees globally.

4.4 Whistleblowing & Escalation

- ICG Medical operates a global, confidential whistleblowing system for reporting concerns.
 - Allegations are investigated thoroughly and escalated in line with our safeguarding framework and local laws.
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5. Governance & Monitoring

ICG Medical's leadership and compliance teams will:

- Ensure annual reporting in line with the Modern Slavery Act 2015.
 - Track internal KPIs, including training completion, supplier compliance, and reported incidents.
 - Review and update this policy annually to align with evolving legislation, risk factors, and industry best practice.
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ICG Medical – Modern Slavery and Human Trafficking Statement 2025

ICG Medical and its subsidiaries are committed to preventing modern slavery, human trafficking, forced labour, and exploitation in any part of our business or supply chains. We recognise our responsibility, as a global staffing business, to uphold the highest standards of integrity and human rights.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the actions we've taken during the financial year ending 31 March 2025.

Our Business

ICG Medical operates across the globe placing healthcare professionals in temporary and permanent roles. Our candidates are sourced through digital platforms, job boards, social media, recruitment events, and referrals. As a people-focused organisation, we are acutely aware of the risks of exploitation in the recruitment sector.

Our Supply Chain

Our supply chain includes direct recruitment and the use of third-party suppliers, including external agencies that introduce candidates to ICG Medical for onward placement. We expect all suppliers to operate legally, ethically, and transparently. Each supplier must meet the standards outlined in our Supplier Code of Conduct, which includes specific reference to modern slavery and human rights obligations.

Our Policies and Approach

We maintain clear policies that reflect our zero-tolerance stance on modern slavery, including:

- A Supplier Code of Conduct mandating compliance with all labour laws.
- A Whistleblowing Policy allowing employees to report concerns confidentially.
- A Safeguarding Policy ensuring concerns are addressed swiftly with relevant authorities.

We require that:

- Employment is freely chosen, with the right to leave upon reasonable notice.
- All employees are given a legal contract of employment.
- No worker is subjected to discrimination, harassment, or exploitation.
- All wages, benefits, and working hours comply with local law and international labour standards.

Due Diligence and Risk Management

We carry out robust checks on all workers before placement, including identity verification and right-to-work screening. Our internal teams are trained to spot warning signs of trafficking or forced labour. Supplier reviews and risk assessments form part of our ongoing due diligence, and we investigate any potential breaches thoroughly.

Training and Awareness

All ICG Medical employees receive guidance on recognising and responding to modern slavery risks. Additional training is provided where appropriate, and our policies are regularly reviewed to ensure relevance and compliance.

Looking Ahead

We are committed to continuous improvement in how we identify, assess, and address modern slavery risks. Over the coming year, we will:

- Enhance supplier monitoring and accountability measures.
- Expand training and awareness resources for staff and partners.
- Strengthen collaboration with industry bodies and regulators.

Approval

This statement has been approved by the ICG Medical Board and will be reviewed annually.

Adrian Treacy,
Chief Executive Officer
ICG Medical
Date: 21st March 2025

