



MODERN SLAVERY POLICY

Introduction

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.

In 2026, ILG reaffirms its zero-tolerance approach to modern slavery and human trafficking in all its forms. We remain committed to acting ethically, responsibly, and transparently across all business operations and supply chains, and to taking effective measures to prevent modern slavery, forced labour, child labour, and exploitation.

The Company operates predominantly within the UK and engages with a range of suppliers and service providers. While we assess our overall risk of modern slavery as low, we recognise that risks can exist at any tier of the supply chain and remain vigilant in monitoring, reviewing, and improving our controls and processes.

This policy applies to all employees, workers, contractors, agency staff, suppliers, and business partners, regardless of location.

ILG acknowledges its responsibilities in relation to tackling modern slavery and is committed to complying with existing national and local laws and regulations including, but not limited to, those relating to slavery, human trafficking, forced labour, child labour, immigration, data protection, health and safety and the environment. ILG understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

ILG aims to develop relationships with its supply chain based on mutual trust and all dealings will be always conducted in a professional manner. ILG does not knowingly conduct business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to ILG in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. ILG adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

This procedure outlines the efforts ILG will make to seek to eradicate human trafficking and slavery from our supply chains. ILG opposes any use of slavery or human trafficking in the delivery of the services that we provide and fully supports the promotion of ethical and lawful business practices within our workplace.

ILG will not tolerate or condone any form or practice that constitutes human trafficking or slavery in any part of our business.

Definitions

ILG considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse

- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or having restrictions placed on freedom of movement.

Procedure

ILG's suppliers are an important part of our success and our culture. We expect each of these business partners to conduct their business with the same commitment to ethical business practices as ILG. The workplace practices that we expect from our suppliers include:

- Suppliers are not to use slave labour, illegal child labour or forced labour and will ensure that the overall terms of employment are voluntary.
- Suppliers shall follow all local applicable laws pertaining to minimum age requirements, wages, overtime and benefits.
- Suppliers shall follow all local applicable laws pertaining to the number of hours worked in a seven (7) day week.
- Suppliers will periodically certify that they conform to the expectations described above and that the product / services they supply comply with the laws regarding human trafficking and slavery of the country or countries in which they are doing business.

During 2026, we continue to support our Modern Slavery commitments through the following policies and procedures: Modern Slavery Policy; Code of Conduct; Whistleblowing Policy; Recruitment and Right to Work Procedures; Supplier Due Diligence and Procurement Standards.

All policies are reviewed regularly to ensure ongoing alignment with legislation, good practice, and organisational values.

ILG has strict internal processes in place to ensure that all ILG employees receive at least the minimum wage and have the right to work in the UK. This procedure is linked to our Code of Conduct Policy and Whistleblowing Policy. Employees are asked annually to confirm their adherence to the company and employee Code of Conduct Policy. Any violations or suspected violations of the Code are encouraged to be reported promptly. We have an "open door" policy which allows employees to take their concerns to higher levels of management via our confidential whistleblowing service.

Suppliers must be able to demonstrate compliance with this procedure at the request and satisfaction of ILG. Where it is deemed appropriate, ILG will conduct internal verification of product supply chains to evaluate and address risks of human trafficking and slavery.

ILG will maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and human trafficking. ILG will promptly and thoroughly investigate any claim or indication that a supplier is engaging in human trafficking or slave labour. If a supplier to ILG is found in violation of this procedure, ILG will take prompt, remedial measures to address the violation.

ILG will provide ongoing training to relevant employees (including those who have direct responsibility for supply chain management) on the laws and ILG's procedure against human trafficking and slavery.

In contracting for goods and services from a third party, ILG reserves the right to include in the contract a right to (1) audit the third party's books, records and policies regarding human trafficking and modern-day slavery; (2) require the third party to make a representation and warranty that the third party is aware of the requirements of and is in compliance with relevant national and local laws and regulations including the Modern Slavery Act 2015; and (3) terminate the contract, without penalty, in the event the third party violates.

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 ILG or under our control. Stakeholders are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their manager if they believe or suspect that a conflict with this policy has occurred or may occur in the future or alternatively, they must report it in accordance with ILG’s Whistleblowing Policy as soon as possible. Likewise, suppliers should notify their point of contact should they have any similar concerns.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the organisation’s supply chains constitutes any of the various forms of modern slavery, they should discuss it with their manager or report it in accordance with ILG’s Whistleblowing Policy as soon as possible.

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 because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising concern. If an individual believes that they have suffered any such treatment, they should inform their manager or another appropriate person immediately. If the matter is not remedied it should be raised formally with HR following usual grievance procedures.

Roles and Responsibilities

All ILG employees are required to read, understand, and comply with this Policy. Each employee with other employees under their supervision is responsible for ensuring that this Policy is duly communicated and implemented and that such employees are familiar with and follow this Policy.

The ILG HR team has been entrusted with the role of (i) providing support and advice to ILG employees regarding this Policy; (ii) investigating and/or managing any breach of this Policy; (iii) enforcing this Policy. Also, in 2026 a small number of colleagues are being trained in safeguarding as ILG employ vulnerable adults who need additional consideration, so we can spot any potential risks for them outside of work.

Questions and complaints

All employees must promptly contact their line manager, or the HR team, when they have questions or doubts about or arising from this Policy and the matters it addresses.

All employees who suspect violations of this Policy must speak up and raise the issue to their line manager, or a member of the HR team. For the purposes of raising doubts or complaints, employees may also use ILG whistleblowing channel, by calling the relevant hotline number 0800 915 1571 or reporting online at www.safecall.co.uk/report.

Review and Version Control

This Policy will be reviewed every year or as required.

Date	Version	Change Description	Author
March 2025	1.0	Document created	Kristine Pollock – HR Director
June 2025		Published internally	
April 2026	2.0	Updated and published	Kristine Pollock - CPO