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Modern Slavery Policy

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Version: 3
Review: January 2025



Modern slavery statement

The Modern Slavery Act 2015 requires commercial organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual 'Slavery and Human Trafficking Statement'. The Statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain.

What is Modern Slavery?

Modern slavery is an international crime, affecting an estimated 29.8 million slaves around the world. It is a growing global issue that transcends age, gender, and ethnicities. It includes victims who have been brought from overseas and vulnerable people in the UK, who are forced to illegally work against their will across many different sectors such as agriculture, hospitality, construction, retail, and manufacturing.

INTRODUCTION

IMC Locums takes a zero-tolerance position on violations of anti-human trafficking and anti-modern slavery laws. If we find breaches of these laws within our company or supply chains, we will look to support individuals and companies in their efforts to comply with the legislation or if findings are severe IMC Locums would report findings to the relevant authorities and cease to conduct business with the parties involved until further investigations have been undertaken.

We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent, and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values here at IMC Locums Limited.

POLICY

IMC Locums is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.

IMC Locums is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.

Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to their Divisional Manager and/or our HR Manager.



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We would also recommend reading this in conjunction with our other policies, including our:

Freedom to Speak Up policy.

Our procedures

We have several procedures in place that contribute to ensuring modern slavery does not occur in our business or anyone we do business with.

Employment:

- Robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; contracts of employment and checks to ensure everyone employed is 16 and above
- Market-related pay and reward structures, which is reviewed annually and linked to the relevant industry to ensure how we operate is fair
- An enhanced benefits package which we pride ourselves on, we are the market leading payer and are known for working off the smallest commission margins hence being able to pay our workers the best rates

Employee training

IMC Locus provides appropriate training and awareness information for all of its staff. In particular:

- Our leadership team and/or senior managers receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our recruiters also undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

Reporting knowledge or suspicion of slavery

Reports surrounding these issues are taken extremely seriously by our board of directors and senior leadership team, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:

- Working with the appropriate organisations to improve standards,



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- Removing that organisation from our preferred supplier list,
- Passing details to appropriate law enforcement bodies.


We already have in place a whistleblowing procedure in our Freedom to Speak up Policy which ensures that anyone who has concerns, for example, about how partners or staff are behaving, has a means of raising their concerns confidentially. Our whistleblowing procedure is available on a confidential basis to report any suspicions our employees may have regarding modern slavery to a director of the company and our employees have been signposted to this in our communications and are constantly reminded.

We regularly monitor our risks in this area through the use of relevant key performance indicators, including:

- The effectiveness of enforcement against suppliers who breach policies,
- The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
- The level of modern slavery training and awareness amongst our staff.

Developing a procedure to monitor how our suppliers comply with our supplier Code of Conduct, at present we check all the companies on our supply chain to make sure their policies and procedures are in line with the requirements.

IMC Locums Limited shall take responsibility for this statement and its objectives which will be reviewed and updated as appropriate to comply with legislation.

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Change Control



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Date	Reason	Version
31/01/2022	Initial Document	1
31/05/2023	Reviewed	2
13/08/2023	Reviewed	3

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