



Modern Slavery Act Policy

Policy Owner: People and Culture

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Contact: peopleadmin@2itesting.com

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Provision for Exception:

These provisions apply to all business units unless an exception is formally requested and approved. Exceptions should be requested by People & Culture. The Policy Exception Process is subject to approval by Policy Owners and Policy Review Committee.

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Contents

1	Introduction	3
2	Purpose.....	3
3	Scope	4
4	Definitions.....	4
5	Commitment.....	4
6	Supporting Policies and Documents	5
7	Supply Chain Transparency.....	6
	7.1.1 Procedures on Slavery and Human Trafficking	6
8	Due diligence in relation to modern slavery	7
9	Training	8
10	Monitoring and evaluation.....	9
11	Spotting Modern Slavery.....	9
12	Reporting and Whistleblowing	11

1 Introduction

2i is committed to preventing modern slavery and human trafficking in all areas of its operations and supply chains. We take a zero-tolerance approach to any form of modern slavery, including servitude, forced or compulsory labour, and human trafficking. This policy supports our compliance with the UK Modern Slavery Act 2015, specifically Section 54, and reflects our values of integrity, transparency, and respect for human rights.

2 Purpose

The purpose of this policy is to set out 2i's commitment to preventing modern slavery and human trafficking within our operations and supply chains. In line with Section 54 of the UK Modern Slavery Act 2015, it provides a clear framework for identifying and addressing risks, while promoting transparency, accountability, and ethical conduct across the business.

This policy aims to:

- Promote a culture of respect for human rights.
- Ensure effective risk management and due diligence in relation to modern slavery.
- Provide guidance to staff, suppliers, and stakeholders on how to identify and report potential cases of exploitation.
- Safeguard the integrity of our business and the wellbeing of those working within or connected to our operations.

3 Scope

This Policy and its supporting guidance apply to all 2i employees.

4 Definitions

2i 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 to have restriction placed on freedom of movement.

5 Commitment

In accordance with Section 54 of the Modern Slavery Act 2015, 2i as a commercial organisation with an annual turnover exceeding £36 million and operations in the UK, is required to publish this annual Modern Slavery Statement outlining the steps taken

to ensure slavery and human trafficking are not taking place within its business or supply chains.

2i acknowledges its responsibilities in relation to tackling modern slavery and is committed to complying with the provisions of the Modern Slavery Act 2015. The company recognises that this requires an ongoing review of both its internal practices concerning its workforce and, additionally, its supply chains.

2i does not enter into business with any organisation, in the United Kingdom or abroad, that knowingly supports or is found to be involved in slavery, servitude, or forced or compulsory labour.

No labour provided to 2i in the delivery of its services is obtained through slavery or human trafficking. The company strictly adheres to the minimum standards required under relevant employment legislation in the United Kingdom or abroad.

This statement is made in pursuance of s.54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

6 Supporting Policies and Documents

This policy is supported by the following:

[Supplier Relationship Policy](#)

[The Code of Conduct outlined in our Employee Handbook](#)

7 Supply Chain Transparency

Most of the services we provide are sourced from reputable suppliers and third parties who are based in the UK and the European Union. From time to time, we may also source services from other geographies and territories.

7.1.1 Procedures on Slavery and Human Trafficking

As part of our compliance with the policies referred to above, we always aim to ensure that we take the following action(s):

- Assess potential and emerging risks in our supply chain.
- Monitor potential risk areas in our supply chain.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains, including, where necessary, reviewing the controls our suppliers have in place and carry out other relevant suitable checks.

2i has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

Accountability for ensuring procedures are adequate and are adhered to in all areas of our business activities rests with the Directors of 2i, responsibility for following and complying with these procedures rests with all 2i staff, associates and third party sub-contractors.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

2i will work towards maintaining transparency in its supply chains. This involves communicating its values and expectations to suppliers and encouraging them to adopt anti-slavery and human trafficking measures.

8 Due diligence in relation to modern slavery

2i carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

We use a four-step supplier governance process for procuring, onboarding and managing suppliers:

1. Supplier management policy outlining services, requirements and data handling.

Evidence: [Supplier Relationship Policy](#)

2. Signed agreements as part of contract/SLA process

Evidence: Contract folders with service agreements.

3. Monitoring and review via ISO Management Review Meetings

4. Ongoing governance of supplier risk scores, mitigation measures and contractual arrangements.

Evidence: Supplier Master File, Supplier Governance Handbook

Supplier Engagement

We assess whether our preferred suppliers hold ISO9001 certification as a measure of service quality. Where certification is absent, suppliers complete a Provider Quality Assessment form. We currently have no concerns or reported incidents on file.

Future Enhancement

We plan to map the geographies of all suppliers using the supplier assessment form.

Monitoring of suppliers' support for skills development and apprenticeship initiatives is an area we are looking to develop further.

9 Training

2i provides the following training to staff to effectively implement its stance on modern slavery:

- **The Modern Slavery Act (UK)** – The course looks at the key provisions of the Act around the prevention of forced labour and human trafficking.
- **Identifying Modern Slavery in the Supply Chain** – The course explain how modern slavery occurs in the supply chain and how to spot red flags.

KPIs/Effectiveness Measures

These courses will be **mandatory** for all employees involved in supplier negotiations, raising purchase orders, or managing contractor agreements. This includes team members from **People & Culture, Finance, Procurement, and Operations**, at a minimum.

We aim to ensure that **at least 95%** of this group complete the training by **the end of August 2025**. While our target is high, we acknowledge that achieving 100% may not be feasible due to exceptional circumstances such as long-term sickness, maternity leave, or other extended absences.

10 Monitoring and evaluation

- Our modern slavery statement will be updated annually to reflect progress and new risks.
- This policy will be reviewed every year or sooner if there are changes in legislation or our operations.
- Key performance indicators (KPIs) will be developed to monitor the effectiveness of our actions.

11 Spotting Modern Slavery

Modern slavery can be difficult to recognise, but there are some common signs. If you notice any of the following red flags, please report your concerns immediately.

Red Flags to Look Out For:

Unusual Business Practices

- Unrealistically low prices or extremely fast delivery timelines.

- Lack of transparency – suppliers unwilling to share information about their workforce, subcontractors, or sourcing.
- Cash-only payments or irregular invoicing.
- No formal contracts or unusually vague agreements.
- Over-reliance on third-party labour providers with little oversight.

Workforce Concerns

- Reports of poor working conditions or long hours without rest.
- Evidence of underage workers, or workers lacking identification documents.
- Signs of restricted movement, such as workers being unable to leave the premises.
- Lack of access to grievance mechanisms or worker voice.

Behavioural Indicators

- Suppliers avoid or delay audits or onsite visits.
- Refusal to engage in training or ethical compliance checks.
- Discrepancies between reported and actual workforce size or composition.

Geographic or Sector Risks

- Operating in countries or industries known for **high exploitation risks** (e.g. agriculture, construction, textiles, electronics).
- Sudden changes in suppliers or sourcing regions without clear justification.

What You Can Do

1. Ask questions – especially when something doesn't seem right.
2. Document concerns and escalate to Procurement, Legal, or People and Culture.

12 Reporting and Whistleblowing

Employees, suppliers, and other stakeholders are encouraged to report any concerns or suspicions of modern slavery. Reports can be made:

- To a line manager or People and Culture team: peopleadmin@2itesting.com

All concerns will be taken seriously, investigated, and addressed appropriately. Victim support will be prioritised, and no one will suffer any detriment for reporting in good faith.

As part of our commitment to the Modern Slavery Act 2015, 2i underscores the importance of staff awareness regarding the Modern Slavery Helpline. If you observe any concerns related to modern slavery within our operations or supply chains, we encourage you to promptly utilize the 24-hour telephone reporting line at 08000 121 700 or the online reporting function on the Modern Slavery Helpline website (<https://www.modernslaveryhelpline.org/>). Your vigilance and reporting play a crucial role in upholding our commitment to eradicating modern slavery. We are dedicated to maintaining a safe and ethical work environment, and your contribution is vital in achieving this goal.

For additional information and guidance, you can refer to the government's official guidance available here [modern slavery procurement guidance on GOV.UK](#).