# Modern Slavery Policy Statement

**Introduction**

Here are the steps Intercity has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains. This statement is published in line with section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31st December 2024.

**About Intercity**

Intercity provides IT solutions in communications, cloud, security and managed IT services.

In this statement "Intercity" applies to our entire Group of companies, this includes: Intercity Technology Group Holdings Ltd (ultimate parent company), Intercity Technology Holdings Ltd (parent company) and Intercity Technology Ltd, which has the subsidiaries Intercity Networks Ltd, Intercity Managed Services Ltd, Chandler Communications Ltd and Centrality Ltd.

We have offices in Birmingham, Bolton, Northampton and Meppershall.

**Our commitment to the principles of the Modern Slavery Act 2015**

Intercity is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We are a signatory of the United Nations Global Compact.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our team. We want all our team to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective team members are legally entitled to work in the UK and to safeguard colleagues from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

**Our policies in relation to the Modern Slavery Act 2015**

Intercity's comprehensive policy framework helps us manage our approach to modern slavery risks. As part of Intercity's ongoing commitment to combating modern slavery, in 2024 we conducted an internal refresh of our polices including but not limited to:

- Anti-Slavery and Human Trafficking Policy
- Code of Conduct and Business Ethics Policy
- Whistleblowing Policy
- Anti-Bribery & Corruption Policy

- Supplier Management Policy
- Purchasing Policy
- Employment and recruitment policies which comply with all UK law

Our whistleblowing policy includes a mechanism for reporting genuine suspicion of any criminal conduct or breach of a legal or professional obligation by anyone in the firm or the Group, or by a client or contractor, which includes instances of modern slavery.

Access to Intercity's policies are available to all colleagues via our Company SharePoint pages or our People Portal.

**Our supplier due diligence processes**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chain, all supplier reviews incorporate a review of the controls undertaken by the supplier to ensure compliance to the Modern Slavery Act 2015. Additionally, any proposed new supplier shall need to demonstrate their compliance before they can be considered for addition to the preferred supplier list (PSL).

We are implementing a Supplier Code of Conduct to ensure suppliers are aware of our expectations around conduct and behaviours to encourage a collaborative and compliant based working relationship and reviewing and further developing our existing clauses around modern slavery to ensure suppliers are contractually committed to operational compliance.

**Risk and compliance**

We have taken steps to evaluate the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain and does not consider that the business operates in a high-risk sector or locations.

Intercity does not tolerate slavery and human trafficking within its supply chains and would immediately seek to terminate its relationship with a supplier where evidence of a failure to comply with Intercity's policies was discovered.

**Measuring effectiveness**

We have taken the following steps:

- established and assessed areas of potential risk in Intercity's businesses and supply chains;
- monitored potential risk areas in Intercity's businesses and supply chains;
- reduced the risk of slavery and human trafficking occurring in Intercity businesses and supply chains; and
- provided adequate protection for whistleblowers.

**Training for colleagues**

To support the principles of the Modern Slavery Act 2015, we will continue to provide awareness training to the Intercity Team on the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of slavery or human trafficking.

All colleagues at Intercity are provided with modern slavery training every two years, and members of our Procurement Team are also provided with specific training on an annual basis on their role in preventing modern slavery in our supply chain. This training ensures that all team members involved in procurement activity are aware of and follow modern slavery procurement guidance provided by the UK Government.

Signed:



Andrew Jackson – CEO