

Human Right and Modern-Day Slavery.

V4.0

Updated: **August 2024**

Review: **September 2025**

ITG Group is committed to ensuring our employees and that of our suppliers are treated with the respect and rights they deserve to be given from an employer, regardless of their nationality, colour, ethnic origin or any other status.



Human rights are inherent rights for all internal and external stakeholders, regardless of their colour, language, nationality, national or ethnic origin, religion, sex, or any other status. This Human Rights Policy sets out a commitment to respect human rights by having processes in place to identify, prevent, mitigate, and account for how ITG addresses its human rights impacts.

This Policy is designed to provide a structure and approach to develop effective management systems to mitigate human rights risks whilst promoting positive human rights impacts and stop any employment of staff or suppliers that may not comply with human rights and modern-day slavery regulations. The Group People Team policies will support this policy and the organisations approach to human rights.

1. Purpose of this Policy

This Human Rights Policy sets ITG's position with regards to its commitment to respecting the Internationally recognised Human Rights.

This is an area of growing importance to ITG and our stakeholders, it ensures that human rights are upheld across our operations, supply chain, and in business relationships. All elements of ITG will respect the human rights of all, including but not limited to employees, supply chain workers, communities, and consumers directly and indirectly affected by our operations and services.

2. Stakeholder Engagement

We engage and consult with internal and external stakeholders on our human rights risks and impacts in addition to our human rights performance. We work with our internal and external stakeholders including but not limited to trade unions, non-governmental organisations, suppliers, and business partners to advance our human rights commitments.

Where our operations could affect local communities, we seek to engage with community stakeholders in identify, addressing, mitigating, and remediating adverse human rights risks.

3. Human Rights Objectives

ITG is committed to respecting human rights in line with the United Nations Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

ITG will comply with applicable international law, namely the Modern-Day Slavery Act 2015 in the UK and any national legislation that is applicable to human rights and modern-day slavery. Where national and international human rights standards conflict, we will comply with national requirements whilst promoting international standards.

As part of our human rights commitment, we aim to:

- Avoid adverse human rights impacts resulting from our business by respecting the rights enshrined in the International Bill of Human Rights (Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights) and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work;
- Protect individuals and/or groups who are vulnerable to the adverse impacts of our direct and indirect operations on the basis of their age, disability, ethnicity, gender identity, indigenous identity, marital status, migrant status, linguistic group, nationality, sexual orientation, religion, and any other characteristics as protected by international instruments and national laws; and,
- Promote positive human rights impacts by adhering and supporting the delivery of the UN Sustainable Development Goals (SDGs).

4. Policy Statement

ITG's Human Rights Policy is approved by its Board of Directors and is overseen by the ITG Group ESG team. ITG's Human Rights Policy outlines the core standards and expectations we have established for all personnel associated with the business. Our Human Rights policy will apply to all employees, regardless of their job or position. This includes all full-time, part-time, temporary employees, independent contractors, direct suppliers, indirect suppliers, and business partners while performing related activities and services. Additionally, all stakeholders will be required to meet ITG expectations and policy with regards to respecting human rights and labour rights of supply chain workers and communities.

We will work to uphold and respect human rights by identifying, addressing, and monitoring actual and potential adverse and positive impacts, cooperate in the remediation of negative human rights impacts, and communicate its progress to all key stakeholders.

To meet these policy objectives, we will:

- Embed human rights due diligence across business operations, policies and processes;

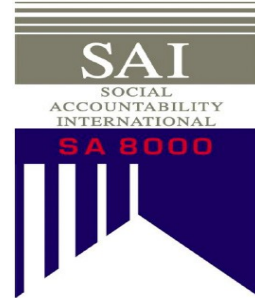
- Assess and identify any potential and actual human rights risks and impacts on an annual basis, including salient human rights risks in its direct and indirect operations (e.g. human rights impact assessment (HRIAs));
- Prevent and mitigate adverse human rights risks;
- Monitor the effectiveness of human rights policies and processes;
- Communicate its human rights performance to internal and external stakeholders, and;
- provide access to remedy through accessible effective grievance mechanisms, supported and delivered by the People Team.

As part of the Human Rights and Modern Day Slavery Policy ITG will be conforming to SA8000 in social accountability. This certification will aid in ensuring ITG group is maintaining and continually improving its human rights controls and standards. Part of the SA8000 will be our commitment to:

- ITG will not engage in or support the use of enforced or compulsory labour;
- ITG will not withhold any part of any personnel salary, benefits, property or documents in order to force such personnel to continue working for the business;
- ITG will not apply any employment fees or costs in whole or in part by any worker including deposits.
- Personnel will have the right to leave the workplace or premises after completing the standard workday and be free to terminate their employment provided they give a reasonable notice period;
- ITG will never engage in human trafficking or associated with any business or organisation that supports or conducts human trafficking;
- Employees will have the right to form, join
- or organise a trade union or to bargain collectively through a representative nominated within the business (this person will be freely elected);
- ITG will conform to applicable laws in working hours and business best practice in line with its policies and processes
- ITG will not engage or support discrimination in employment or hiring/recruitment
- ITG will comply to applicability laws in line with its policy for remuneration;
- All employees and visitors will have a safe working environment in line with ITG health and Safety policy and processes;
- The business and any associated stakeholder shall not subject personnel to pregnancy or virginity tests under any circumstance;
- Manage and engage with all third parties and suppliers to assess risk and conformance with social accountability and legislation.

- We will conduct thorough due diligence on our supply chain to identify and assess the risk of modern-day slavery. This includes working collaboratively with suppliers to address and rectify any identified issues.

More information on SA8000 and what it stands for can be found here – [SA8000 Website](#)



5. Policy Objectives and Defined targets

Objectives set below will be for the coming fiscal year 24/25. These will be measured in the annual reporting period for ESG by the ITG group ESG team and audited as part of the group SA8000 certification.

5.1 Supply Chain Audits and Monitoring

Supplier Audits:

- Conduct initial audits for 100% of new suppliers, as part of onboarding process.
- Perform annual audits for 25% of high-risk suppliers.

Audit Findings:

- Achieve an 80% resolution rate for non-compliance issues identified during audits within 6 months.
- Reduce the number of major non-compliance findings by 20% year over year.

5.2 Employee training and awareness

Training Completion:

- Ensure 100% of employees receive human rights and modern slavery training annually.
- Achieve 90% training completion within the first 3 months of employment for new hires.

Training Effectiveness:

- Achieve a 80% satisfaction rate from participants in training feedback surveys.
- Conduct annual refresher courses and ensure 80% participation

5.3 Reporting and transparency

Incident Reporting:

- Establish a whistleblower system and ensure 100% of reports are acknowledged within 72 hours.
- Investigate and resolve 100% of reported incidents within 60 days.

Reporting:

- Report annually on progress in line with objectives and targets set, with an 80% completion rate of targets
- Review the effectiveness of processes in place and show continual improvement

5.4 Human Rights and Employee support

Incident Reporting:

- Aim for 0 instances of human rights violations within the business
- Aim for 0 instances of human rights violations within the supply chain

Risk Reduction:

- Reduce the number of suppliers in high-risk categories by 5% year over year.
- Conduct annual risk assessments for 15% of the supply chain.

6. Human Rights Risks and Impact Assessments

We conduct ongoing due diligence across our business, supply chain, and business relationships in conjunction with regular human rights impact assessments (HRIAs) and stakeholder engagement to improve our understanding of our human rights risks and the effectiveness of our existing policies and processes.

The output of these processes is integrated into our business planning and decision-making considering the environment, human rights, public health, and the communities where we operate. We seek to align our business goals with respect for people and planet, through our good human manifesto and schemes.

7. Governance

The ESG team are responsible for advising and guiding ITG in upholding its human rights commitments, promoting, and respecting human rights is the responsibility for all operational functions.

The Group Chief People Officer hold accountability for the delivery of ITG’s human rights commitments where human rights performance is embedded in our operations and risks assessments, including auditing compliance.

Roles and Responsibilities

Board of Directors	Group ESG Team	Board of Directors
<div>Have overall responsibility and accountability in ensuring the implementation of the Human Rights Policy</div> <div>Review human rights performance regularly in board meetings</div> <div>Communicate human rights commitments, responsibilities, and requirements across a company</div> <div>Promote and champion human rights commitments</div> <div>Ensure adequate resources are available to meet the human rights commitments</div>	<div>Holds responsibility in implementing the Human Rights Policy with the support of their sustainability/human rights teams</div> <div>Reports to the board on human rights performance and guidance for continuous improvement</div> <div>Ensure human rights recommendations from audits, employee engagement, supplier engagement, and other channels are incorporated in improving existing policies and practices</div> <div>Provides technical advice and guidance to other business functions</div> <div>Act as the liaison with external stakeholders on human rights issues</div>	<div>Monitor and report on human rights performance in company’s direct and indirect operations</div> <div>Liaise across different business functions to ensure then implementation of the Human Rights Policy</div> <div>Conduct and report on a company’s human rights impact assessment and provide annual updates</div> <div>Engage with suppliers on the Human Rights Policy (e.g. conducting audits or site visits, supporting pre-contractual screening)</div> <div>Train internal and external stakeholders on the Human Rights Policy relevant to their roles</div> <div>Maintain a high-level understanding of a company’s Human Rights Policy</div> <div>Ensure that human rights risks are incorporated in the pre- and post-contractual screening of suppliers</div>

8. Training and Awareness

To raise awareness and build a culture of respecting human rights throughout our direct and indirect operations, we conduct regular human rights training to increase understanding and familiarise our business with our commitments, interventions, and action plans.

ITG is committed to engaging its suppliers through training and capacity-building to ensure that they uphold the principles set out in this policy.

We seek to support our suppliers in developing and establishing human rights policies and processes.

9. Violations of this Policy or Legislation

If ITG finds that it has caused or contributed to negative human rights impacts, the OECD and UNGP expect that it would engage actively in remediation. A remediation plan and full risk assessment would be reviewed, and actions documented within an incident plan to ensure the human rights issues are addressed and this type of incident is not repeated.

Any violation by a supplier will initiate a termination of services with the supplier or contractor and reporting of the violation in line with applicable legislation.

Any violation by an employee or stakeholder will be dealt with through the group disciplinary policy and process. Any reports of suspected breaches should be reported to ESG@inspiredthinking.group.

10. Contractors and Suppliers

ITG will ensure that contracts and suppliers:

- Ensure that contractor/suppliers employees and their subcontractors understand and have appropriate policies that ensure compliance with an organisation's requirements on worker human rights and labour standards.
- Ensure contractors/suppliers comply with all rules, policies, and procedures.
- Report any human rights or labour standard incidents either in their own operations or across their value chain that ITG have defined as being required to report.
- ITG will also have a separate Supplier Code of Conduct / Policy which outlines their requirements of suppliers on managing and reporting human rights

11. Focus Areas of the Group

ITG recognises all its responsibilities for human rights across all its operations, the most salient of these are:

- Third party suppliers that operate in, what are deemed, higher risk developing countries that may not have the same view or controls of human rights and modern day slavery.
- Clients or stakeholders that are located in and/or operate in locations that may pose a higher risk of breaching UN law or ITG policy on human rights and modern day slavery.

ITG attests that child labour is an infringement of fundamental human rights and is committed to ensuring that children have the opportunity to learn and grow in safe and healthy environments where education is prioritised. ITG will prohibit the use of child labour in its direct and indirect operations.

ITG will not tolerate any form of discrimination in our operations. It should treat everyone fairly and without discrimination. We will uphold the right that everyone is entitled to equal and inclusive working conditions and environment. We actively promote the rights of the aforementioned individuals and groups vulnerable to adverse human rights impacts.

12. Approval and Sign Off

Signed:

Lisa C Elrod

Lisa Elrod
ITG Chief People Officer
Date: August 24

Policy review and approval

This policy will be reviewed annually or with any major change in legislation or practice.
It is approved and monitored at a board level and reported on through internal and external audits, where applicable.
Any questions or queries should be sent to:
ESG@Inspiredthinking.group

Effective date	Version	Owner	Changes
August 2021	V1.0	People Team	First version
November 2022	V2.0	Chris Egerton	New ESG Framework
July 2023	V2.1	Chris Egerton	Update to SA8000
November 2023	V3.0	Chris Egerton	Annual Update
August 2024	V4.0	People Team	Annual Update