

Modern Slavery & Human Trafficking Policy

Company Name: Infutech Limited

Version: 1.0 (2026)

Last Reviewed: 23/02/2026

Policy Owner: Ray Morrissey (Managing Director)

1. Policy Statement

Infutech has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

2. Responsibility for the Policy

- **The Directors** has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

3. Employee Due Diligence

To ensure our internal operations are free from exploitation, we strictly adhere to the following:

- **Right to Work:** We conduct robust "Right to Work" checks on all employees before they start.
- **Direct Payment:** All wages are paid directly into a bank account in the employee's name.
- **Recruitment Fees:** We do not charge "recruitment fees" to any worker, and we only use reputable recruitment agencies on approved NHS frameworks.
- **Whistleblowing:** We provide a confidential "Freedom to Speak Up" channel for any employee to report concerns without fear of retaliation.

4. Supply Chain Management (NHS Compliance)

In line with the 2026 NHS Procurement Regulations, we treat modern slavery risk as a commercial priority:

- **Risk Assessment:** We perform annual risk mapping of our Tier 1 and Tier 2 suppliers.
- **The MSAT:** We require all "Medium" and "High" risk suppliers to complete the UK Government's Modern Slavery Assessment Tool (MSAT).

- **Contractual Clauses:** All new supplier contracts include mandatory anti-slavery clauses and the right for infutech to audit supplier premises.
- **Abnormally Low Tenders:** We investigate any supplier quote that is significantly lower than the market average to ensure it does not rely on depressed wages or forced labor.

5. Identification of Risk: The "Red Flags"

Staff are trained to identify indicators of modern slavery, including:

- **Physical/Psychological:** Signs of malnourishment, physical exhaustion, or restricted movement.
- **Documentation:** Workers who do not have possession of their own passports or ID.
- **Living Conditions:** Large numbers of workers living in shared, poor-quality accommodation provided by an employer.
- **Financial:** Workers being paid in cash or through a third party.

6. Breach of Policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.