



ICS Buildings • Neville Road • Bradford • West Yorkshire • BD4 8TU
Tel 01274 301910 • Fax 01274 301911 • Email info@icsukltd.co.uk

ICS UK Anti-Slavery and Human Trafficking Statement – April 2025 [Annual review]

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that ICS UK (Holdings) Limited and its subsidiaries herein known as ICS UK has taken and is continuing to take to ensure that slavery or human trafficking is not taking place within our business or supply chain. The term “modern slavery” used in this statement includes slavery, servitude, any type of forced or compulsory labour and human trafficking. ICS UK has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our approach to Modern Slavery

ICS UK is committed to having systems to safeguard against modern slavery existing within our business or supply chain. We have reviewed our operations and our supply chain to assess the risk of modern slavery taking place taking into account a number of factors, including the nature of our activities, their location, the sources from which we are supplied goods or personnel and the risk profile of relevant locations.

We have robust procedures for recruiting and onboarding casual, temporary, parttime, and full-time personnel, underpinned by appropriate provisions in the relevant contractual documentation.

We strive to ensure that all employees’ contracts and practices are:

- Compliant with all legislation in regards to working time directives.
- Paid in accordance with the national minimum wage standards. Our policy is to pay above this rate for many of our employees.
- Are treated equally and fairly regardless of race, colour, sexual orientation or religion.
- Have a safe and hygienic place of work that is compliant with all health and safety legislations.

Our recruitment is in line with UK legislation and proof of identity and right to work is obtained for employees before they are offered a contract of employment. Employees are only paid into a bank account that they hold in their own name. The status of our employees is continually checked and monitored.

All employees’ information is kept in line with GDPR guidelines.

Supply Chain

We seek to partner with suppliers that share our values, and we expect our supply chain to operate fair and equitable practices, whereby modern slavery is not tolerated. As part of our supply chain vetting procedures, we assess the ability of the prospective supplier to manage the risk posed by Modern Slavery based on their own policies and procedures.



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All of our non-UK and non-EU based suppliers are checked and visited by the directors or agents representing ICS UK Ltd, themselves prior to them being taken on as a supplier to ICS UK. Our suppliers are long standing and have been chosen as they agree with our views on anti-slavery and treatment of their employees.

If we identify a risk of modern slavery within a supplier, we will consider whether we are satisfied that these risks are being appropriately addressed and we reserve the right to refuse to continue to use or appoint any supplier whose operations and/or supply chain fail to meet our requirements.

We have a dedicated Purchasing team which, in addition to our Finance team, helps to identify potential risks regarding slavery and human trafficking. Where a supplier is implicated, we will engage with the relevant supplier(s) and implement an appropriate and timely response. This may include the immediate termination of the supply agreement.

Future Steps and Continued Commitment

We will continue to work with our partners to better understand their processes and policies to prevent modern slavery within their organisations and supply chains.

ICS UK recognises the importance of maintaining constant vigilance to identify and address any impacts associated with slavery and human trafficking throughout its supply chains; and to continuing to enhance its capacity to identify, prevent and mitigate any actual or potential impacts in this field. We will continue to assess the effectiveness of the measures we take and we will regularly review and refine our policies and procedures in relation to modern slavery.

This statement has been shared with all employees on an annual basis and is incorporated in the induction pack for all new employees. Posters elaborating on the warning signs that may identify modern slavery or human trafficking are placed in positions where all employees can see them. Additionally, a confidential hotline is available for employees to share any concerns.

Endorsement of this Statement

The statement is approved on behalf of the directors of ICS 1976 (Holdings) Limited which includes the subsidiary ICS (UK) Limited on 18th April 2025.

Ismail Bhamji

Ismail Bhamji
(Managing Director)