

Modern Slavery Statement

March 2024

Renewal Date: April 2025

This statement has been published in accordance with the Modern Slavery Act 2015.

Protecting our Staff

Icon is committed to providing its workers with safe, legal employment in a stimulating and rewarding environment. We are opposed to any form of slavery and human trafficking (Modern Slavery) and strive to ensure that it is prevented from occurring in our business and in our supply chains.

Icon aims to carry out all its business dealings in full compliance with applicable laws and with respect to internationally recognised human rights standards in every location in which we operate.

Our Policies

We operate a range of internal policies, aimed at ensuring that we always conduct business in an ethical and transparent manner. All our employees and directors are required to comply with these policies. In the context of preventing Modern Slavery, these policies include the following:

- **Our Ethical Trading Policy**, which explains the manner in which we behave as an organisation and how we expect our employees and directors to act. Each employee and director is responsible for upholding the principles and practices set out within both policies. Our overriding aim is to continue to build and support a culture which values openness, accountability and disclosure;
- **HR policies**, which include equal opportunities, and employee screening policies, ensuring that appropriate, background checks for all employees are made, to safeguard against human trafficking or individuals being forced to work against their will;
- **Whistleblowing Policy**, which allows all employees and contractors, to voice any concerns about treatment of colleagues, or practices within our business or supply chains, without risk of reprisals.
- **Financial Sanctions Policy**, which makes clear to employees and directors the restrictions on activities put in place by the UN, EU or UK.

We regularly review all these policies to ensure that they are fit for purpose and consistent with any changes in legislation and best practice. Employees and directors are made aware of these policies, including during the induction period upon joining Icon and all employees and directors have access to policies via dropbox, in addition to our HR system.

Our Supply Chains

Given the nature of our business, we do not have an extensive supply chain network. Our supply chains include recruitment agencies, cleaning services, IT hardware and software providers, office fit maintenance services, and document retention services.

Icon recognises that it is vital to preserve the highest standards of integrity and transparency within its supply chains, so that those employed within them are not exposed to any form of exploitation. We are therefore selective in our choice of suppliers and conduct the necessary due diligence checks. However, our suppliers may have their own complex supply chains and it is therefore not practicable for us to have direct oversight or management of the working conditions of each supplier.

Our Effectiveness in Combatting Modern Slavery

We are not aware of any incidents of Modern Slavery having been notified or identified since writing this statement. We believe that our culture of openness and accountability, when coupled with our policies and procedures, is effective in combatting the risk that Modern Slavery could be found in our business or in our supply chains. We remain committed to further enhancing and strengthening effective systems and controls, on an on-going rolling basis, to safeguard against and mitigate any risk of Modern Slavery taking place within our business or supply chains.