

## Modern Slavery and Human Trafficking Policy Entrust Professional Services Ltd (UK) & Entrust Limited (Ireland)

### 1. Introduction

Entrust Professional Services Ltd (UK) and Entrust Limited (Ireland) (collectively, **Entrust**) are committed to **eradicating modern slavery, human trafficking, forced labour, and exploitation** from our business operations and supply chains.

We operate under the legal frameworks of:

- **UK Modern Slavery Act 2015** and accompanying Home Office guidance.
- **Criminal Law (Human Trafficking) Act 2008 & Criminal Law (Human Trafficking) (Amendment) Act 2013 (Republic of Ireland).**
- **International Labour Organisation (ILO) Forced Labour Protocol (2014).**
- **UN Sustainable Development Goals (SDGs)**, specifically:
  - **SDG 5** – Gender Equality
  - **SDG 8** – Decent Work and Economic Growth
  - **SDG 16** – Peace, Justice and Strong Institutions

According to the **2023 Global Slavery Index**, an estimated **50 million people** are trapped in modern slavery worldwide, generating **\$245 billion annually** in illegal profits (**ILO 2022 Update**). The **UK National Crime Agency (NCA)** and **Migrant Rights Centre Ireland** report increasing instances of **forced labour and exploitation in supply chains**, particularly in **construction, energy, logistics, and procurement services**—sectors relevant to Entrust’s operations.

### 2. Entrust’s Zero-Tolerance Approach

Entrust enforces a **zero-tolerance policy** towards all forms of modern slavery and human trafficking. We are committed to:

- Ensuring transparency across our operations and supply chains.
- Conducting risk assessments in line with UK & Irish legislation and ILO guidelines.
- Providing employee and supplier training on modern slavery risks.
- Implementing confidential whistleblowing and reporting mechanisms.
- Auditing and reporting annually under UK and Irish legal requirements.

### 3. Scope & Responsibilities

This policy applies to **all individuals working for or on behalf of Entrust**, including:

- Employees, directors, officers, consultants, contractors, agency workers, subcontractors, and suppliers.

#### **Senior Leadership & Governance**

- Entrust's Directors ensures policy oversight and compliance.
- Senior Management Teams implement risk assessments and supplier due diligence.

#### **Supply Chain & Procurement Teams**

- Conduct due diligence on suppliers to identify and mitigate risks.
- Include anti-slavery clauses in contracts and tender processes.
- Monitor third-party contractors and enforce compliance.

#### **Employees & Business Partners**

- Must **understand, comply with, and report concerns** related to modern slavery.

### **4. Risk Assessments & Supply Chain Due Diligence**

Entrust proactively **identifies and mitigates** modern slavery risks by:

- Assessing high-risk sectors (e.g., energy infrastructure, construction, procurement services).
- Monitoring suppliers, particularly in outsourced services and low-wage workforces.
- Requiring all suppliers and contractors to adhere to Entrust's Modern Slavery Policy.

We integrate modern slavery risk assessments into:

- ✓ **Supplier onboarding & contract management.**
- ✓ **Ethical procurement & tender evaluation criteria.**
- ✓ **Regular compliance audits & independent third-party verifications.**

### **5. Reporting & Whistleblowing Mechanisms**

Entrust provides **confidential and secure reporting mechanisms** for employees, suppliers, and stakeholders:

- **Internal reporting through line managers or senior leadership.**
- **External reporting via the UK Modern Slavery Helpline and Migrant Rights Centre Ireland.**
- **Anonymous whistleblowing options for safe reporting.**

Entrust strictly prohibits **retaliation against whistleblowers** and ensures that reports are **thoroughly investigated and resolved**.

## 6. Training & Awareness

Entrust provides **mandatory modern slavery training** to:

- **All employees** during induction and annual refresher sessions.
- **Procurement & supply chain teams** to help identify **high-risk suppliers**.
- **Contractors & suppliers** through compliance workshops.

Training is based on guidance from:

- UK Home Office Modern Slavery Guidance.
- International Labour Organisation (ILO) & UNODC best practices.
- Hope for Justice & Walk Free educational materials.

## 7. Non-Compliance & Enforcement

Failure to comply with this policy may result in:

- Disciplinary action, including dismissal, for employees.
- Contract termination for suppliers and business partners.
- Legal action under UK & Irish modern slavery laws.

## 8. Policy Review & Continuous Improvement

This policy is **reviewed annually** and updated as necessary to reflect:

- Legal and regulatory changes in the UK & Ireland.
- New risk factors identified through global reports (e.g., ILO, NCA, UNODC).
- Feedback from employees, suppliers, and external partners.

**Entrust remains committed to collaboration with government agencies, industry leaders, and human rights organisations to continuously improve modern slavery prevention measures.**