



**iqa**  
**elecnor group**

**Slavery and Human Trafficking**

Slavery and Human Trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

## Our policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking is not taking place anywhere that has any sort of a business relationship our Company.

## Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we:

We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

**Our supply chain providers are always with a UK provider and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

## Training

The senior management Team are responsible for compliance in their respective departments and for their supplier relationships and have been trained accordingly. All employees receive an induction into the business where our policies, procedures and expectations are outlined.

## Our effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring, right to work documentation and payroll audits
- Maintain a level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with our expectations.
- We regularly review supply chain policies, codes of conduct and our working practices to show commitment.
- This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for 2016.

*The IQA Way*

*Quality – Customer Satisfaction – Integrity – Continuous Improvement – People*

DOC: 023	Issued: 02/2019	Last Reviewed: 03/2021	Rev: 2
----------	-----------------	------------------------	--------

For Document Details please consult Q-Pulse Uncontrolled When Printed

## ANTI-SLAVERY STATEMENT

This is the Anti-Slavery Statement of IQA Group for the financial year ending 31 December 2018.

### ABOUT IQA

**IQA Group is a leading provider of utility contracting services to Distribution Network Operators, the private sector and the public sector across the UK.**

Established in 2002, IQA now employs over 350 people across our four sites – Glasgow, Wales, Newcastle and Liverpool.

By providing a range of engineering solutions, IQA Group upgrades ageing cable, switchgear, equipment and infrastructure across Scotland and the North West of England.

IQA also specialises in building services contracting which includes substation installation and maintenance, overhead power line design and build, cable laying, cable jointing and small Civils activities. Our Building Services expertise extends to excavation, fencing and general building maintenance.

In June 2012, IQA became part of Spanish multinational, Elecnor. Elecnor has over 12,000 employees and over 50 years' experience, working across the areas of electricity infrastructure, renewable energies and new technologies.

IQA Group's rapid growth has continued as a result of its commitment to our **values**: Quality, Customer Satisfaction, Continuous Improvement, Integrity and People.

### POLICY IN RESPECT OF ANTI-SLAVERY AND HUMAN TRAFFICKING

IQA will put in place a Code of Ethics that includes commitments in respect of anti-slavery and human trafficking. It will state that we take a zero tolerance approach to any instances of slavery or human trafficking that are identified in our supply chain.

IQA will also put in place an Anti-Slavery and Human Trafficking Policy that outlines our expectations in respect of practices concerning slavery and human trafficking prevention.

We will encourage members of staff and suppliers to report suspected breaches of the Code of Ethics and the Anti-Slavery and Human Trafficking Policy in accordance with our whistleblowing procedures.

In addition to our Anti-Slavery and Human Trafficking Policy, we will put in place processes and procedures to identify risks of slavery and human trafficking in our business and supply chains, including:

- fair and transparent recruitment procedures;
- risk assessments of our supply chain in relation to slavery and human trafficking considering country risk and product/service risk;
- following a risk based approach, anti-slavery and human trafficking due diligence on certain of our suppliers, including self-assessment questionnaires and,
- where appropriate, on-site assessments;

*The IQA Way*

*Quality – Customer Satisfaction – Integrity – Continuous Improvement – People*

DOC: 023	Issued: 02/2019	Last Reviewed: 03/2021	Rev: 2
----------	-----------------	------------------------	--------

For Document Details please consult Q-Pulse Uncontrolled When Printed

## SLAVERY AND HUMAN TRAFFICKING

- contractual controls, including anti-slavery and human trafficking provisions;
- whistleblowing procedures

### TRAINING AND COMMUNICATIONS

Anti-slavery and human trafficking training will be provided to all staff involved in procuring supplies for the business. We will also make all such staff aware of "red flags" of slavery and human trafficking that they should consider when dealing with suppliers during contractual negotiations, site visits or any interaction with the supplier and its workers.

### APPROVAL

Signature  
*Antonio Luis Henarejos Meseguer*,



Managing Director of IQA Group

Date: 05 March 2021

*The IQA Way*

*Quality – Customer Satisfaction – Integrity – Continuous Improvement – People*

DOC: 023	Issued: 02/2019	Last Reviewed: 03/2021	Rev: 2
----------	-----------------	------------------------	--------

For Document Details please consult Q-Pulse Uncontrolled When Printed

**RED FLAG CHECKLIST**

**INTRODUCTION**

There are slavery and human trafficking warning signs (or "red flags") that should be considered by those dealing with suppliers during contractual negotiations, site visits, audits or any interaction with a supplier and its workers. The sections below headed “Working/living conditions” and “Finances” would probably necessitate supplier employee interviews by us. This is not compulsory but rather should be done only where it is felt appropriate.

**CATEGORIES OF SLAVERY OR HUMAN TRAFFICKING**

Slavery or human trafficking includes practices such as: forced labour (i.e. involuntary work coerced by threatening behaviour); the sale and exploitation of children and other vulnerable people; arranging or enabling the trafficking of persons; or any other practice that involves depriving one person of their liberty or freedom in order to exploit them for personal or commercial gain.

Slavery or human trafficking can be hard to spot but it can be thought of in three categories:

<b>Human trafficking</b>	<b>Labour exploitation</b>	<b>Other slavery like practices</b>
<p>1. Recruitment, transportation, transfer, harbouring or receipt of persons;</p> <p>2. By means of threat, force, coercion, abduction, fraud, deception, or the abuse of power or vulnerability;</p>	<p>All work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself voluntarily.</p> <p><i>(ILO Forced Labour Convention, 1930 (No. 29))</i></p>	<p>Attaching and exercising some form of ownership of a person which deprives them of their freedom. It includes slavery-like practices: debt bondage, forced marriage, sale or exploitation of children.</p> <p><i>(Summary of the Slavery Convention (1926) and Supplementary Slavery Convention (1956))</i></p>

*The IQA Way*  
*Quality – Customer Satisfaction – Integrity – Continuous Improvement – People*

DOC: 023	Issued: 02/2019	Last Reviewed: 03/2021	Rev: 2
----------	-----------------	------------------------	--------

For Document Details please consult Q-Pulse **Uncontrolled When Printed**

## **RED FLAGS**

### **SIGNS FROM THE SUPPLIER**

The following signs may give rise to suspicions that slavery or human trafficking could exist in the business of a supplier:

- The manufacturing operations of a supplier being based in countries more prone to slavery.
- Immigrant workers employed by the supplier being from a country that is more prone to slavery.
- Workers being subjected to excessive overtime or other overly demanding conditions.
- The supplier providing accommodation for their workers, which may be substandard.
- Lack of grievance mechanisms for employees, or an absence of union representation.
- Reluctance to allow third party factory inspections or audits
- The business having no policy or programme in relation to slavery or human trafficking, or no similar employee policies.
- Interviews or conversations with workers giving rise to concerns.
- Instances of slavery or human trafficking identified in the supplier's business, or a linked company.

### **SIGNS FROM THE WORKER**

The victim's behaviour, working conditions, or finances may give an indication that they are subjected to slavery like practices.

#### **Behaviour**

Workers may:

- Shows signs that their movements are being controlled.
- Be threatened with being handed over to authorities.
- Depend on their employer for work, transport and accommodation without any choice.
- Only travel with other workers.
- Have limited contact with their families or people outside their immediate work environment.
- Have their passports removed.
- Be required to pay recruitment fees out of their wages.
- Be in a situation of dependence.
- Come from a place known to be a source of slavery or human trafficking.
- Be afraid or revealing their immigration status.
- Show fear or anxiety.

*The IQA Way*

*Quality – Customer Satisfaction – Integrity – Continuous Improvement – People*

DOC: 023	Issued: 02/2019	Last Reviewed: 03/2021	Rev: 2
----------	-----------------	------------------------	--------

For Document Details please consult Q-Pulse Uncontrolled When Printed

## Working / living conditions

Workers may:

- Have no contract.
- Be unable to negotiate working conditions.
- Be forced to work under certain conditions.
- Work excessively long hours over long periods.
- Not be dressed adequately for the work that they do: for example, they may lack protective equipment or warm clothing.
- Not interact with work colleagues.
- Lack basic training or professional licences.
- Believe they are obliged to work without pay in return for provision of accommodation.
- Live in poor or substandard accommodation or have no choice where they live or who they live with.
- Live in groups in the same place.

## Finances

Workers may:

- Receive little or no payment.
- Have no access to their earnings.
- Be disciplined through punishment or fines.
- Be under the perception that they are bonded by debt.
- Have the fees for their transport to a destination country paid for by their employer or facilitator, which they must pay back through work.
- Be charged for services they do not want or need.
- Be forced to open bank accounts.
- Have wages paid into an account used by other people.
- Have bank cards / documents held by someone else.

*The IQA Way*

*Quality – Customer Satisfaction – Integrity – Continuous Improvement – People*

DOC: 023	Issued: 02/2019	Last Reviewed: 03/2021	Rev: 2
----------	-----------------	------------------------	--------

For Document Details please consult Q-Pulse Uncontrolled When Printed

## HUMAN TRAFFICKING RISK ASSESSMENT

If you are considering taking on a new supplier or extending a contract with an existing supplier, consideration should be given to the risk that supplier poses from a slavery and human trafficking perspective.

The following procedure should be followed:

2. The supplier should complete our anti-slavery self-assessment questionnaire.
3. If anything, untoward or unusual is revealed by the questionnaire, we should investigate as far as possible and ultimately conduct a site visit if we are still keen to proceed.
4. If the supplier is operating in any country where 0.2% or more of the population are in slavery according to the "Walk Free Foundations Global Slavery Index" ([www.globalslaveryindex.org/findings](http://www.globalslaveryindex.org/findings)) a site visit must be conducted if we are still keen to proceed.
5. The site visit should be conducted using our "Red Flag" checklist.
6. If anything, untoward or unusual is revealed at any stage of the procedure which might suggest slavery, human trafficking or labour exploitation, it should be discussed with the Compliance Director. No contact should be entered into with the supplier in such circumstances until the Compliance Director has given approval.

*The IQA Way*

*Quality – Customer Satisfaction – Integrity – Continuous Improvement – People*

DOC: 023	Issued: 02/2019	Last Reviewed: 03/2021	Rev: 2
----------	-----------------	------------------------	--------

For Document Details please consult Q-Pulse Uncontrolled When Printed