

UK Supply Chain Right to Work Policy



This policy applies to contractors and subcontractors engaged by ISG Limited

POLICY PURPOSE AND SCOPE

- 1.1 ISG is committed to providing a working environment that is free from risks to the health and safety of our employees, contractors and visitors to our premises and projects. To that end, we will take all required and reasonable measures to ensure that only those who are eligible to work in the UK are employed by ISG or by third parties on ISG UK sites and premises. This is vital not only to avoid instances of illegal working but also to maintain the health and safety of ISG's workplaces.
- 1.2 This policy aims to ensure that ISG's supply chain is compliant with applicable UK legislation and requirements regarding an individual's right to work.
- 1.3 This policy may be amended or withdrawn by ISG at any time at its absolute discretion.

2. UK REQUIREMENTS

- 2.1 UK law imposes robust duties on employers to check an employee's right to work and be able to evidence having done so. ISG expects its contractors and subcontractors to know their responsibilities. To that end, ISG requires those in its supply chain to have specific right to work policies and procedures in place, in line with UK requirements. The laws of the UK will always be the absolute minimum requirement those in our supply chain should be adhering to.

3. RIGHT TO WORK CHECKS

- 3.1 The "right to work" is the legal right to work in the UK (whether on an unlimited or time limited basis). Those employers in our supply chain have a duty to make manual or online checks on every person they intend to employ before they start work to ensure they have the right to undertake the work in question. This will involve checking an individual's documentation (which must be acceptable evidence as prescribed by the Home Office) in their presence, retaining a copy of it and making a compliant record of that right to work check.

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- 3.4 In the short term, an acceptable alternative will be a letter from one of the major accountancy, legal or consultancy firms, acceptable to ISG, which confirms that the firm has checked the A1 application, confirms that it is in order and confirms that it has submitted it to the relevant authority on behalf of the subcontractor.
- 3.5 ISG reserves the right to bar access to site to those individuals who do not produce an A1 following the letter referred to in 3.4 within a reasonable period that ISG shall, in its absolute discretion, determine.
- 3.6 The above are specificities for those working in the EEA, however, any and all other additional country specific requirements within the EEA or otherwise must be also adhered to.

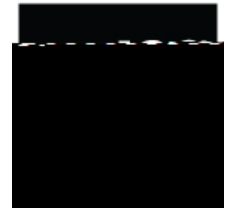
4. RESPONSIBILITIES

Contractor/sub-contractor

- 4.1 It is the responsibility of the contractor or subcontractor engaged by ISG, as an individual's employer, to complete all required right to work checks to ensure their staff have the right to work. ISG expects all contractors and subcontractors it engages with to take these duties seriously and have robust processes in place to ensure compliance. Similarly, they are expected to ensure those contractors and subcontractors they engage with to complete works on ISG sites or premises also take such duties seriously and are compliant, minimising the risk of illegal working through the entire supply chain.

- 4.2 \$ OO FRQWUDFWRUV DQG VXEFWRQWUDFWRUV ZLOO EH UHTXLVHG to complete a compliance questionnaire DV SDUW RI ,6 *¶ V 3 or

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- 7.2 Where illegal working is suspected on a site, the local team should only gather the minimum level of information required in order to pass this on to the ISG Business Unit Compliance and Business Assurance teams. Illegal working can also be linked to other factors such as modern slavery and exploitation etc. It may be necessary for the

