

# UK Supply Chain

## Right to Work Policy

This policy applies to contractors and subcontractors engaged by ISG Limited and/or its subsidiaries and affiliated entities in the UK. References within the policy to "ISG" shall, where the context permits, include ISG subsidiaries and affiliated entities.

### 1. 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- 1.3 This policy may be amended or withdrawn by ISG at any time at its absolute discretion.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. Repeat checks must be completed against anyone with time limited permission to work in the UK. Employers are required to diarise when their employee's immigration permission expires and have sufficient tracking processes in place to ensure a repeat right to work check is completed before that expiry. These initial, and repeat, right to work checks are the responsibility, and duty, of the employer, not ISG.
- 3.2 ISG operates a "no paperwork, no entry" rule on all sites for its own staff. ISG expects its supply chain to apply the same standards and ensure their staff do not enter or work on a UK ISG site or premises unless and until they have been subject to a right to work check. ISG contractors and subcontractors will be required to agree to comply with this requirement when contracting with them.

### UK EMPLOYEES WORKING IN EEA

- 3.3 In the case of workers from any of the European Economic Area (EEA) states or Switzerland that require an A1 as an alternative to paying social security contributions in the EEA state or Switzerland in which they will be working temporarily, the A1 certificate must be produced.

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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 All contractors and subcontractors will be required to complete ISG's Right to Work compliance questionnaire as part of ISG's PQQ due diligence process. Such questionnaires must be completed honestly and signed off by a Director of the contractor/subcontractor's business.
- 4.3 Whilst working with ISG, contractors and subcontractors may be asked to complete ISG's Right to Work compliance questionnaire at regular intervals after the initial PQQ process has been completed, in order that ISG can carry out ongoing monitoring of the contractor/sub-contractor systems and processes.
- 4.4 As referenced at 5.5 below, from time to time ISG may wish to carry out right to work supply chain audits on the policies and procedures adopted by its contractors and subcontractors regarding right to work documentation for its employees. ISG requires its contractors and subcontractors to cooperate fully with all such audits. Any failure to do so may result in ISG no longer contracting with that organisation. If a particular contractor or subcontractor is found to be falling short of ISG's required standards in this area, ISG may require them to adopt appropriate process and policy improvements to strengthen their compliance and minimise the risk of illegal working arising.
- 4.5 Contractors and subcontractors are expected to have a named individual responsible for providing all required information and documentation regarding right to work compliance to ISG on-site or at their premises.
- 4.6 ISG expects its contractors and subcontractors to take steps to ensure the same standards of right to work compliance are adhered to within their own supply chain, which they may engage to complete works on ISG sites or premises.
- 4.7 If an individual employed in ISG's supply chain (directly or indirectly), and working on an ISG site, is found to be an illegal worker, ISG will block the individual's access to the site until such time that sufficient evidence of the right to work in the applicable jurisdiction is provided.

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### 4.8 ISG RESPONSIBILITIES

4.9 ISG employees, at all levels of responsibility, are expected to be mindful of this policy when engaging contractors and/or subcontractors.

4.10 **ISG Board of Directors** – Responsibility for ISG's over-arching policies, in relation to supply chain right to work requirements and standards expected of its contractors and sub-contractors. Ensure suitable resources are made available to meet the ISG responsibilities as stated in this policy.

4.11 **ISG Supply Chain Teams** - Responsible for ensuring that contractors subcontractors complete the relevant ISG Right to Work compliance questionnaire as part of the PQQ process. Any material concerns will be highlighted to a member of ISG's Business Assurance team without delay.

4.12 **ISG Group Business Assurance Team** – Responsible for carrying out regular supply chain right to work audits both on-site and remotely and sharing the results and agreeing follow up actions with the relevant ISG business unit. Progress will be monitored by the Business Assurance Team to ensure all non-conformances are addressed. The Business Assurance team is to act in an advisory capacity for guidance on how to conduct right to work checks and general compliance in this area.

5. **ISG Business Unit Compliance Teams** - (*For the areas of ISG's business which has its own local compliance team in place.*) Responsible for ensuring ISG's contractors act in accordance with ISG's policies and applicable laws including Immigration, Asylum and Nationality Act 2006, Modern Slavery Act 2015 and GDPR 2018. The business unit compliance teams are also responsible for the issuance, management and review of the ISG Supply Chain Right to Work Questionnaire and report areas of concern to the Group Business Assurance team without delay. Must work in conjunction with the Group Business Assurance Team to highlight contractors of concern and assist the team with carrying out audit work, as and when may be necessary. Such audits may include the provision of sub-contractors' contracts, requests for further audit information, problem solving and ensuring that lessons learned are incorporated into ongoing improvements.

### 6. SUPPLY CHAIN AUDITS

6.1 ISG may choose to conduct right to work compliance audits against its contractors and subcontractors to assess their compliance with applicable right to work requirements in the UK.

6.2 Audits may range from the required completion of the general ISG Right to Work compliance questionnaires by the contractor / subcontractor to reviewing the contractor's / subcontractor's processes and completing sample reviews and/or spot checks of individual right to work records and documents. The level of audit required by ISG in particular circumstances will vary according to factors such as the project value, size of workforce involved and ISG's client or Board requirements. The audits will also include, although will not be limited, to checks on compliance with other legislations such as the Modern Slavery Act 2015 and General Data Protection Regulations.

### 7. IDENTIFIED OR SUSPECTED ILLEGAL WORKING

7.1 Where an ISG employee discovers or has reasonable cause to believe that an individual in ISG's supply chain and working on an ISG site, does not have the right to work, they should notify the relevant Health & Safety lead, or a member of the Business Assurance or the ISG Business Unit Compliance team without delay. ISG will then investigate the matter with the relevant contractor or subcontractor employer.

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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 Police/authorities to conduct an investigation covertly to avoid notifying criminal parties/gang leaders etc. As such, it is vital that ISG staff do not interfere with this process.

### 8. DATA PROTECTION

8.1 ISG may or may not retain copies of documentation for those working on site. If documentation is not retained, ISG may record limited details of the check conducted. Any data will be kept securely for the period reasonably required by ISG and that which applicable data retention regulations allow. Where it is deemed necessary to retain data, a Legitimate Interest Assessment may need to be carried out.

8.2 From time to time, ISG and its clients may decide to introduce additional right to work checks on the employees of its contractors and sub-contractors. This will depend on a variety of factors and will be discussed separately between ISG and senior members of the contractors/sub-contractor's teams. If any additional right to work checks are deemed to be necessary due regard will be given to data protection obligations and where necessary, a Legitimate Interest Assessment will be carried out.

8.3 ISG will only keep personal data and special category personal data for as long as is necessary to fulfil the purposes we have collected it for. The particular requirements can vary according to local requirements and the category of personal data held.

### 9. CHANGE IN LAW

9.1 ISG reserves the right to make any changes to this policy that are required to meet any changes in the laws of the United Kingdom. Where such changes are made, ISG will provide an updated version of this policy to the contractor and the contractor will carry out any actions required by any change in law and update its own policies as necessary.

### 10. QUERIES

10.1 Any queries about this policy should be raised with HR or Business Assurance Departments.

This policy was approved by the Board of Directors of ISG Limited on 29 September 2020.

For and on behalf of ISG Limited

Signed:



Paul Cossell  
**Chief Executive Officer**

Date: 29 September 2020