

MODERN SLAVERY POLICY

ORGANISATION'S STRUCTURE AND PRINCIPAL ACTIVITIES

Innovative Technology Limited ("ITL", "we", "us") is a privately-owned company, which has several wholly owned subsidiaries including material operations in China and Brazil. The Group has its head office in the UK.

The Group has an annual turnover in excess of £36m. The Group's principal activities are of the design, manufacture, assembly and distribution of equipment for automated transactions.

The Group includes non-trading holding companies Bells Holdings Limited and Bellis Group Limited hence separate statements have not been prepared for these entities given the inward supply chain finishes with ITL.

OUR SUPPLY CHAINS

Our supply chain includes the sourcing of note and coin validation equipment, age estimation devices, and parts for such products, from within the UK and abroad. ITL recognises that we have an obligation to embed ethical purchasing practices within both stock and non-stock procurement. Procurement is managed through the operations team supported by development, legal and finance. Suppliers are evaluated as part of our standard process.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

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.

This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains.

Our recruitment process, including conducting eligibility to work in the UK checks for all employees, further supports us in safeguarding against human trafficking or individuals being forced to work against their will.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

As part of our initiatives to identify and mitigate risk we communicated directly with our supply chain partners to: identify potential risk areas in our supply chain, monitor identified risk areas, and protect whistleblowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values. The Group will not support or deal with any business knowingly involved in slavery or human trafficking.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

KEY AREAS OF FOCUS IN 2019/20

This is the third ITL Modern Slavery statement, and in the past year we have continued to increase the depth and breadth of our work on Modern Slavery, deepening our understanding of risk, and ensuring we have in place the most effective responses to that risk.

We consider Modern Slavery to be a growing global issue and know our customers share our concern. Our commitment to our customers is very clear, we will always treat people in our business and supply chain fairly, this has included the following areas of focus:

- Focusing on understanding further our supply chains including labour providers and recruiters to supply chain services.
- Continued development of our ISO 9001 compliant Control of External Providers' policy.
- Enhanced supplier due diligence.

IMPACT OF COVID-19

As well as focusing on the health and safety of workers, the impact of the COVID-19 pandemic has presented additional areas of focus. At various stages in the year work to address new risks too place over previously planned activities. Salient activities include:

- Ensuring relevant local or national government policies are implemented throughout the supply chain.
- Updating workplace risk assessments.
- Increased regularity of risk updates to the Board of Directors.

KEY PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the current financial year.

This statement has been approved by our board of directors who will review and update it as necessary on an annual basis.



P Dunlop
Managing Director
Innovative Technology Limited
Last updated: August 2020