



Iconic Smiles Modern Slavery and Human Trafficking Policy

Policy Statement

At Iconic Smiles, we are unwavering in our commitment to upholding human rights and ethical practices across every aspect of our operations. In adherence to the Modern Slavery Act 2015, we fully recognise the profound importance of preventing slavery, servitude, forced labour, and human trafficking. As an award-winning, patient-centred organisation, we not only meet but strive to exceed our obligations under the Act. In recognition of our ethical business practices, we are proud to be **Good Business Charter Accredited in 2023**, demonstrating our dedication to transparency, responsibility, and fairness across our operations. This policy outlines our zero-tolerance approach to modern slavery, embedding a culture of transparency and responsibility that ensures ethical practices across our supply chain, workforce, and communities we serve.

Scope

This policy applies to:

- All employees, directors, and contractors of Iconic Smiles.
- Our suppliers, subcontractors, and any third parties we engage with.
- All locations and jurisdictions where Iconic Smiles operates.

Our Commitments

1. Zero Tolerance for Modern Slavery

We maintain a strict prohibition on any form of slavery, servitude, forced labour, or human trafficking within our organisation and supply chain. This includes rigorous compliance with the Modern Slavery Act 2015 and other international human rights standards.

2. Transparency in Supply Chains

- **Supplier Vetting and Due Diligence:** All suppliers are subject to robust due diligence, including:
 - Verifying compliance with the Modern Slavery Act.
 - Reviewing policies, labour practices, and ethical sourcing processes.
 - Contractual obligations ensuring suppliers uphold anti-slavery commitments.
- **Risk Assessments:** We conduct annual risk assessments to identify high-risk suppliers or geographies, ensuring timely intervention and mitigation.

3. Ethical Employment Practices

- All employees work under freely agreed contracts, with wages meeting or exceeding the National Minimum Wage.
- We ensure fair treatment, freedom from discrimination, and no retention of original identification documents.
- Staff are fully aware of their rights, with grievance mechanisms in place.

4. Training and Awareness

- Mandatory training for all employees to recognise signs of modern slavery.
- Directors and senior managers receive enhanced training to assess risks in decision-making and supply chain management.



- Awareness campaigns highlight our zero-tolerance stance internally and externally.
- 5. **Whistleblowing Mechanisms**
We encourage employees, suppliers, and stakeholders to report suspicions of modern slavery through our confidential whistleblowing system. Reports are investigated immediately, and corrective actions are implemented without delay.
- 6. **Monitoring and Reporting**
 - **Audits:** Routine audits are conducted across our practices and suppliers to ensure compliance.
 - **Annual Assessment:** Iconic Smiles assesses an annual Modern Slavery and Human Trafficking detailing:
 - Steps taken to combat modern slavery.
 - Risk assessments and actions implemented.
 - Effectiveness of measures, supported by metrics.
 - **Continuous Improvement:** We commit to ongoing reviews and updates of our policies and procedures to remain at the forefront of ethical practice.

Exceeding Legal Requirements

At Iconic Smiles, we go beyond the requirements of the Modern Slavery Act by implementing the following proactive measures:

1. **Supplier Partnership Programme**
We work collaboratively with suppliers to improve working conditions, ethical labour practices, and social impact initiatives. Through educational workshops, resources, and incentives, we foster a shared commitment to eradicating modern slavery.
2. **Third-Party Accreditation**
We actively seek partnerships with independent certification bodies to verify ethical practices within our supply chain. Where possible, we favour suppliers certified by organisations such as the Ethical Trading Initiative (ETI).
3. **Community Engagement and Advocacy**
 - Partnering with local organisations to support anti-slavery initiatives.
 - Acknowledging programmes that assist victims of modern slavery, providing rehabilitation, training, and employment opportunities.
4. **Good Business Charter Accreditation**
As a **Good Business Charter Accredited organisation in 2023**, we are recognised for our commitment to ethical practices, including:
 - Employee well-being and fair treatment.
 - Responsible business practices.
 - Ethical supply chain management and transparency.

Responsibility for Policy Implementation

- **Board of Directors:** Overall responsibility for ensuring this policy is effectively implemented and reviewed.



ICONIC | SMILES

- **Compliance Manager:** Responsible for conducting audits, training, and overseeing risk management activities.
- **All Employees:** Expected to adhere to this policy, report concerns, and actively contribute to our ethical culture.

Key Performance Indicators

To ensure the effectiveness of our anti-slavery measures, Iconic Smiles tracks the following metrics:

- Number and results of supply chain audits conducted annually.
- Incidents of non-compliance identified and resolved.
- Training completion rates for employees and suppliers.
- Reports received via whistleblowing mechanisms and the resolution rate.

Conclusion

Iconic Smiles is dedicated to fostering a culture of integrity and respect for human rights. By exceeding the requirements of the Modern Slavery Act, and through our **Good Business Charter Accreditation**, we not only safeguard our workforce and supply chains but set a benchmark for the healthcare industry. Through this policy, we reaffirm our unwavering commitment to making a meaningful difference in the fight against modern slavery.

This policy is reviewed annually and endorsed by the Director.

Signed: