



N W T C

NWTC MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Policy Statement

We have a zero-tolerance approach to Modern Slavery and Human Trafficking in our organisation. Both crimes are an abuse and violation of fundamental human rights.

- Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.
- Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

We strictly prohibit the use of modern slavery and human trafficking in our operations and supply chain.

This policy is non contractual and we may amend it at any time.

Commitment

We undertake to ensure that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015, as amended.

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Due diligence

We are committed to preventing slavery and human trafficking and have policies and processes in place to ensure that our employees are not being exploited and that they have a safe and supportive working environment.

To support this, we have taken the following steps:

- All employees have a contract of employment that sets out their employment rights and obligations including the period of notice needed for them to terminate their contract and leave our employment, thus employees are entirely free to serve notice at any time.
- We verify all employees' identities and ongoing right to work in the UK.
- We do not withhold any employee's physical identity documents (e.g., passport) during their employment with us.
- We comply with all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies, sickness and family friendly rights and minimum rest breaks and periods.
- We fully comply with the National Minimum Wage legislation.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Warning Signs

It is important that anyone working for us understands what modern slavery and human trafficking is, understands the warning signs and know where to report suspicions of modern slavery.

We have listed below some warning signs to look out for, though not exhaustive:

- Physical appearance – signs of abuse, looking malnourished or appear withdrawn;
- Isolation – Rarely working alone, seemingly under the control or influence of another and rarely interacting with others;
- Poor living conditions and suspicions of them living at the same address that they work at;
- Few personal possessions and wearing the same clothing again and again, sometimes clothing unfit for the work they are undertaking;
- Unusual and long working hours with little or no break
- Avoiding eye contact, appearing frightened etc.

Reporting Process

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must report it to hr@nwtc.uk.com

Every instance will be taken seriously and fully investigated. You will not be victimised for the reporting of a situation. If you are anxious or afraid, for your own personal protection and safety, you can ask to

remain anonymous. Please be assured that you will be fully supported through the reporting and investigation of any genuine breach of our modern slavery policy.

Breaches

Any of our employees in breach of this policy, without a satisfactory reason, will be liable to serious disciplinary action being you up to and including summary dismissal.

If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action.