

# Anti-Slavery and Human Trafficking Policy

Policy 2020

**Safeguarding  
your tomorrow,  
today.**

# Northcott Global Solutions

## Anti-Slavery & Human Trafficking Policy



### Anti-slavery and human trafficking policy

*This policy requires to be reviewed at least annually from the publication of the last version.*

**Effective Date: 27<sup>th</sup> January 2020**

#### Document Control

#### Version control / history

Name	Description	Date
O'H	Version 1.0	28 <sup>th</sup> September 2018
O'H	Version 2.0	24 <sup>th</sup> January 2020

#### Approvals

Name	Position	Date
Ted Jones	CEO	1 <sup>st</sup> October 2018
Ted Jones	CEO	27 <sup>th</sup> January 2020

This policy applies to all employees of Northcott Global Solutions and includes third parties, temporary, contract staff and anyone who comes into contact with the Northcott Global Solutions resources, sites, and properties that fall under the control of Northcott Global Solutions. It also applies to all current locations, and new locations shall take the policy into account during the design, development or feasibility of access control systems being installed in new construction or as part of any major or minor improvement project.

The above will be referred to as users in the rest of this document.

Note: that in cases where any applicable legal, statutory or other regulations for the protection or accessibility of corporate information / records exist, these may take precedence over this policy



## Background

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. Modern slavery is a crime and a violation of fundamental human rights.

## Policy Statement

Northcott Global Solutions strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards

## Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- 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 take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk based approach we may require:
  - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct.
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code.
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.