

Anti-Slavery and Human Trafficking Policy

Policy 2022

**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: 24th January 2022

Document Control

Version control / history

| Name | Description | Date |
|----------------|-------------|---------------------------------|
| O'H | Version 1.0 | 28 th September 2018 |
| O'H | Version 2.0 | 24 th January 2020 |
| Fabian Roberts | V 3.0 | 27 Jan 2021 |
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Approvals

| Name | Position | Date |
|-----------|----------|-------------------------------|
| Ted Jones | CEO | 1 st October 2018 |
| Ted Jones | CEO | 27 th January 2020 |
| Ted Jones | CEO | 27 Jan 21 |
| Ted Jones | CEO | 24 Jan 2022 |
| | | |

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 (NGS) 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

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

- NGS has 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 the organisation or supply chain is the responsibility of all those working for it or on its behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- NGS is committed to engaging with its stakeholders and suppliers to address the risk of modern slavery in its operations and supply chain.
- NGS takes a risk based approach to its contracting processes and keep them under review. It assesses whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in contracts with third parties. Using a risk-based approach NGS also will 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 NGS may require:
 - employment and recruitment agencies and other third parties supplying workers to NGS 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 NGS' ongoing risk assessment and due diligence processes it will consider whether circumstances warrant the company carrying out audits of suppliers for their compliance with our Code of Conduct.
- If NGS find that other individuals or organisations working on its behalf have breached this policy, the company will 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.