



# MODERN SLAVERY & HUMAN TRAFFICKING POLICY

**Review date:** January 2023  
**Next Review Date:** January 2024

## MODERN SLAVERY & HUMAN TRAFFICKING POLICY

This statement applies to all companies within or associated to NIC Services Group (referred to in this statement as 'The Group').

We are an outsourced facilities management company. The Group has its Head Office in Leeds and operates throughout the United Kingdom.

### Definitions

The Group considers that modern slavery encompasses:

- Human Trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or have restriction placed on freedom of movement

### Commitment

The Group acknowledges responsibilities in relation to tackling modern slavery and commits to complying with the provisions set out in the Modern Slavery Act 2015 in that we do not trade with or support in any way any organisation, in the United Kingdom or overseas, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required to its responsibilities under the relevant employment legislation.

### Supply Chains

We expect our suppliers and other business partners to have the same high standards as we impose on our own business.

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our own values in this regard.

### Potential Exposure

In general, the company considers exposure to slavery and/or human trafficking to be unlikely within our own theatre of operation. Nonetheless, we have taken steps to ensure that such practices do not take place in our own business nor the business of any organisation that supplies goods and/or services to us.

### Due Diligence Process for Slavery and Human Trafficking

The Group has not, in its knowledge, conducted any business with any other organisation which has been found to have involved itself in modern slavery. In accordance with section 54(4) Modern Slavery Act 2015, the Group has taken the following steps to ensure that modern slavery and/or human trafficking is not taking place:

- We carry out appropriate checks to ensure that any new applicant is suitable for the role that they have applied for. Prior to making an offer, it is our usual practice to ensure that all applicants are aware of what checks we carry out. We make job offers subject to prior completion of appropriate satisfactory vetting procedures.
- All our people undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checking and, where applicable, DBS checks. We employ most of our people directly or on a fixed-term basis with checks in place to ensure that payment of salary is made direct to that person

- We limit the geographical scope of our operations to the UK and Europe (Republic of Eire).
- Where possible, we build a long-standing relationship with all our local, national and international suppliers and make it clear what our expectations are in relation to their own business behaviours, we expect them to be akin to ours and for them to have their own modern slavery policy statements reflecting just that.
- Our Employee Handbook sets out our policies and key procedures. We give all our people access to the Handbook when they begin work. This document, together with our targeted awareness on Modern Slavery and human trafficking helps us to deliver our key messaging so that our people can comply with our requirements.

## Measures

To check how effective we have been ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains we use the following measures:

- We have a system in place where staff are encouraged to 'Speak-up' and report any concerns they may have via a confidential 'Hot line' and 'Email address.' We very much encourage Whistle Blowers.
- We have a vigorous Right to Work staff engagement process that is conducted before we employ staff
- We ensure minimum employment age adhered to in line with current legislation – Generally all staff are 18+ years old.
- We always apply national minimum wage thresholds, in line with current legislation.
- Regular contact with our supply chain partners to ensure their understanding and compliance with our own expectations.
- Access to online training videos for all staff so as to ensure they too know what signs to look for and how to report any concerns via our 'Speak Up' confidential (Whistle Blower) helpline
- We operate a corporate social responsibility policy which incorporates our stance on modern slavery.

This policy takes into account and very much supports the policies, procedures and requirements documented within our Management Systems (the NIC eHub) and ISO9001, ISO14001 and Safety Schemes in Procurement (SSIP).

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed each financial year.

Signed on behalf of NIC Services Group

A handwritten signature in black ink, appearing to read 'S. Tidswell', is written over a light blue horizontal line.

**Signed:**

**Date: 5<sup>th</sup> January 2023**

**Simon Tidswell**

Company Secretary