



HUMAN RIGHTS & LABOUR STANDARDS POLICY

Review date: January 2023
Next Review Date: January 2024

HUMAN RESOURCES & LABOUR STANDARDS

This policy statement summarises the underlying framework for Human Resources, Human Rights and Labour Standards as approved and published internally for NIC Services Group Limited.

Purpose and scope of Policy

NIC Services Group's principal asset is its people and their commitment to provide a consistent and quality service to its customers. As such the Group recognises the relationship between poor labour standards and poor service levels. We are committed to ensuring both the Group and its suppliers achieve the acceptable labour standards at all times. In conducting its business and striving to meet its corporate aims, our employees and directors will adopt the following principals:

- Exercise honesty and diligence in performing their duties and undertaking their responsibilities
- Maintain high standards of integrity, morality and competence
- Not contravene national laws and relevant regulations in the conduct of their duties
- Not enter into any activity that may result in a conflict of interest with the company
- Not accept anything of value which could be described as an inducement or which could impair their judgement
- Not use the company's confidential information for personal gain
- Not act in a manner that could discredit the company, customers or suppliers
- To operate an ethical workplace
- Be loyal in all matters affecting the company, including matters relating to customers and others with whom the company has a commercial relationship
- Not permit any act by an employee that is considered to be corrupt either under relevant law or by reference to good business practice

Fairness and Human Dignity

It is NIC's commitment to provide a workplace environment where employees are recognised as the most valuable asset, treated with respect, dignity and consideration. This commitment is built upon a framework of policies and procedures designed to ensure fairness in the recruitment, retention, training, and development of all employees.

Discrimination

Our employment policies for recruitment, selection, training, development and promotion are designed to ensure that no job applicant or employee receives less favourable treatment on the grounds of age, race, colour, nationality, ethnicity, religion, gender, marital status, disability, sexual orientation or offending background that does not create any risk to the company, colleagues, vulnerable adults or children.

Subject to the need to ensure necessary protection as above we will make every effort to prevent discrimination against those with criminal records.

- All recruitment procedures are designed to encourage applications from all sections of the community and all abilities.
- We ensure all application processes are user friendly and avoid unnecessary barriers
- We will continue to identify underrepresented, disadvantaged or excluded groups
- Equal opportunities data is collected, analysed, and used to inform our planning and decision-making processes.

Human Rights

- Each person that works with NIC shall be treated with dignity and shall not be subjected to any harassment, physical or mental punishment or other forms of abuse
- We promote effective engagement through our business and welcome open and sincere feedback from all colleagues on all matters of the company's business interest.
- There is an effective Grievance management process in place at NIC, which is transparent, and equitable to enable the remediation of any abuse of human rights and the impacts that may arise.

Child Labour & Forced or Compulsory Labour

- NIC does not and will not engage in or support the use of child labour. If we engage any young workers (e.g. for work experience, or CSR) we ensure that a suitable risk assessment is carried out and that the young persons are not exposed to any hazardous condition, and work no more than 7 hours per day.
- We shall adhere to and strictly comply with International child labour conventions and Child Labour Laws and regulations
- In the same manner, NIC will not engage or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave after providing reasonable notice in line with their individual contracts of employment. All employees shall provide their services to the company on an entirely voluntary basis and no one shall be forced to remain in the employment of our Group against their will.

Freedom of Association

- We believe in the power of direct engagement with our employees. Whilst we do not formally recognise a trade union or a collective representative body, we recognise and respect the right of our employees to freely associate with any organisations which exists to further and defend their interests in the workplace.
- Our employees shall not be dismissed or otherwise prejudiced for reason of membership of such an employee organisation or because of participation in that organisation outside of working hours, or with consent of their line manager, within working hours.
- Our employees shall enjoy protection against discrimination by virtue of their membership of an employee organisation and employment shall not be conditional upon an employee joining or not joining or relinquishing membership of such organisation.

Health & Safety

NIC Services Group Ltd is committed to ensuring the health, safety and welfare of its employees, so far as is reasonably practical. We also fully accept our responsibility for other persons who may be affected by our activities. We will take steps to ensure that our statutory duties are always met and that there are progressive improvements in health and safety performance. It is NIC Services Group Ltd's policy, as far as is reasonably practical, to:

- Provide safe systems of work
- Provide and maintain safe plant and equipment
- Provide a safe place of work with safe access and egress
- Provide for the safe use, handling, storage and transport of all articles and substances used
- Provide a safe working environment
- Provide adequate and sufficient information, instruction, training, and supervision

Working Hours/ Periods

NIC shall comply with applicable laws and industry standards on working hours and holiday entitlements.

Remuneration

We shall comply with national laws and regulations with regard to wages and benefits in all of our business operations. All work-related activities are carried out on the basis of a recognised employment relationship established according to national law and practice.

Responsibilities and Raising of Concerns

- The implementation and monitoring of this policy is the responsibility of NIC's Directors.
- Managers at all levels within NIC are responsible for ensuring those reporting to them understand and comply with this policy.
- Employees and associated persons are required to notify NIC as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or that they are a victim of another form of unlawful activity.
- This policy is relevant to the company itself, our contractors, sub-contractors, suppliers, freelancers, and other parties engaged with NIC. We reserve our right to terminate our contractual relationship with any third-party suppliers if they breach this policy.
- All persons engaged with NIC shall ensure that they read, understand, and comply with this policy. They are required to avoid any activity that might lead to or suggest a breach of this policy.
- Employees shall notify their respective manager or director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- If a breach of this policy is believed or suspected to have occurred, the employee shall notify a manager or director or report it in accordance with our whistleblowing policy as soon as possible.
- NIC is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion of a breach of the minimum standards.

Communications and Awareness of this Policy

- Training on this policy, and the risk our business faces from a breach of modern slavery obligations in its supply chains, will form part of the induction process of all individuals who work for us, and training will be provided as necessary.
- NIC shall endeavour to communicate the policy as appropriate to its suppliers, contractors, and business partners at the outset of our business relationship and reinforce as appropriate thereafter
- NIC shall make this policy publicly available (specifically via its website www.nicgroup.co.uk) and the policy will be communicated to all members of the groups employee's in the first instance, and also to all contractors, sub-contractors and suppliers.

Breaches of this Policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct.
- We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Periodical Review of this Policy

- The effectiveness and implementation of this policy will be reviewed as it is deemed appropriate, but no less frequently than every 12 months. Policy review will be undertaken by the directors of NIC Services Group Limited.
- The company commits to periodically reviewing this policy in order to continually improve labour standards within the workplace. The company shall take into consideration: Changes in legislation, legal advice as and when necessary and any other requirements to which NIC Group subscribes, to ensure the adequacy, suitability, and continuing effectiveness of this policy.

A handwritten signature in black ink, appearing to read 'S. Tidswell', is positioned above the printed name.

Signed:

Date: 5th January 2023

Simon Tidswell

Company Secretary