

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Scope

This document establishes the Modern Slavery Act 2015 in relation to policy for NBC Group. References in this policy to the 'Company' are to NBC Group. References in this policy to 'our people' are to employees of the NBC Group.

Introduction

In 2016 Teresa May wrote: *"It is not acceptable for any organisation to say, in the twenty-first century, that they did not know. It is not acceptable for organisations to ignore the issue because it is difficult or complex. And, it is certainly not acceptable for an organisation to put profit above the welfare and well-being of its employees and those working on its behalf."*

At NBC Group we recognise that slavery and human trafficking are significant human rights issues and are committed to taking appropriate and proportionate steps to mitigate the risk of these occurring within our business and our supply chain.

As a construction and labour supply and training operator within the UK, the key areas of our operation that have the potential to be affected by slavery and/or human trafficking are our directly hired employees, agency workers carrying out work on our behalf, subcontractor operatives working on our sites and the workforce of our supply chain who supply materials to our business.

Purpose

The NBC Group takes a zero-tolerance approach to non-compliance with this Policy and will not tolerate any slavery or human trafficking in any part of its business or in any part its supply chain. This Policy applies to all NBC subsidiaries nationwide, their officers, directors and employees, whether permanent or temporary. It also applies to the NBC supply chain, which must ensure that both its business and that of its supply chain comply with this Policy.

NBC Group will take steps to ensure that modern slavery and human trafficking are not taking place in its own business or within any of its supply chain. This will be achieved by ensuring that:

- Suppliers must comply and act in accordance with this Policy. Its Strategic and Preferred supplier base must be accredited to an Achilles third party scheme. Modern Slavery compliance is covered in this. All other Suppliers must have submitted a Pre-qualification document, which also covers the Act.
- All recruitment is carried out in fair and transparent manner and will comply with relevant legislation and standards.
- The requirements and expectations made of the supply chain in relation to the Act will be clearly communicated and included within contractual terms.

- Suppliers will be expected to comply with the Immigration, Asylum and Nationality Act 2006.

NBC will take a partnership approach with regards to working with its suppliers to combat the threat of modern slavery and human trafficking across its sectors and all the industries in which it operates.

NBC will train appropriate staff to understand the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it and or report it.

Every NBC Group employee has an individual responsibility to ensure compliance with this Policy, including being alert to the risk of such unlawful practices. Any concerns may be reported to the NBC Group Risk Management function.

NBC Group considers a breach of this Policy as a serious offence. Any violation of this Policy or the Act by an employee will result in disciplinary action, up to and including dismissal in appropriate circumstances. In addition, NBC will notify the relevant authorities of an individual or a supplier's contravention of the Act.

The Managing Director Jag Sidhu is responsible for the content of this policy, our approach is overseen by the Chief Executive Nick Sidhu and overall accountability for compliance rests with the Executive Board.

The NBC Group Modern Slavery Act Policy will be brought to the attention of all our people. The policy does not form part of our people's contract of employment and may be amended by the NBC Group.

Signed:  _____ (Jag Sidhu) Date: 10 May 2020

Position: Director Responsible for Modern Slavery and Human Trafficking

Review Date: 10 May 2021