



NG Bailey

**Anti-Slavery and
Human Trafficking
Policy**

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Document Amendment Summary

Issue Date	Version	Author	Approved by	Details of Changes
Apr-18	0.1	Natalie Wilkinson	Rob Smith	n/a
Jan-20	0.2	Natalie Wilkinson	Rob Smith	Additional information added to breaches of the policy section
Jun-22	0.3	Natalie Wilkinson	Jonathan Stockton	Update to whistleblowing information and general stylistic updates
Jul-24	0.4	Natalie Wilkinson	Clare Salmon	Additional information included throughout – full policy refresh

POLICY STATEMENT

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

The NG Bailey Group of companies (this includes but is not limited to NG Bailey Group Limited, NG Bailey Limited, NG Bailey IT Services Limited, NG Bailey Facilities Services Limited and The Freedom Group of Companies ("NG Bailey")) is committed to acting ethically and with integrity in all its business dealings and relationships and as a minimum operates in accordance with all local and national laws.

Policy Statement

This policy outlines NG Bailey's commitment to eliminating modern slavery from its operations and supply chains. By complying with this policy, everyone working for or on behalf of NG Bailey plays a vital role in upholding these standards. The Modern Slavery Act 2015 ("the Act") defines legal requirements related to modern slavery. Failure to comply with the Act can result in significant penalties for NG Bailey and individuals. In addition, the Act clarifies that a victim's consent to their situation does not automatically excuse non-compliance.

We expect the same high standards from all persons working for NG Bailey or on its behalf in any capacity, including but not limited to, employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and suppliers and any other third parties who act in partnership with or on behalf of NG Bailey and whose conduct will reflect upon NG Bailey. For the purpose of this policy this collective group will now be referred to as workers unless explicitly advised otherwise.

NG Bailey is committed to ensuring there is transparency in its own business and in its supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015 (the Act). This policy sets out the standard to which the Group and all associated parties are expected to adhere. We currently manage risk and disclosure obligations through our internal modern slavery working group, a forum of subject matter experts drawn from across the business who collectively monitor risk and drive progress in their respective areas. We have systems and controls in place to reduce the risk of modern slavery taking place in our business and supply chains with full details available in our modern slavery statement which can be found online at www.ngbailey.com.

Definitions

- **Modern slavery:** The term 'modern slavery' is used to denote situations where one person deprives another person of their liberty to exploit them for personal or commercial gain.
- **Human Trafficking:** Human trafficking is the act of recruiting, transporting, transferring, harbouring or receiving a person, through any coercive means (such as threat, use of force, deception or abuse) for the purpose of exploitation. Where the victim is under 18 years of age, there is no requirement of coercive means.
- **Forced Labour:** Forced labour is any work or services which people are forced to do against their will under the threat of some form of punishment. Almost all slavery practices, including trafficking in people and bonded labour, contain some element of forced labour

NG Bailey specifically prohibits the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. It is essential that those working within our business and our supply chains are treated with fairness, dignity and respect and are free from discrimination and exploitation. NG Bailey expects that its suppliers will hold their own suppliers to the same high standards as outlined in our Code of Integrity for Business Partners (available at www.ngbailey.com).

Minimum expectations

For the avoidance of any doubt NG Bailey have set out our minimum expectations for all persons working for NG Bailey, on its behalf or operating within our supply chain below:

- **Freedom of movement and to choose employment:** Workers must not be subject to any form of forced or compulsory labour. Workers must be able to terminate their employment on reasonable notice and without penalty. Passports, travel, identification or work authorisation papers must not be withheld. Retaining personal documents

must not be used to restrict workers freedom of movement. Workplace or employer or recruiter operated residences must not be mandatory and where they are used, workers must not be confined to these residences.

- **Freedom of association:** Workers must be free to organise, form and participate in groups, either formally or informally of their choosing.
- **Contracts of employment:** Written contracts must be provided before commencement of work in a language that the worker understands. Workers must have clear terms relating to: employment conditions; rights and responsibilities; regular working hours; wages (including lawful deductions); pay cycle; benefits; overtime; leave entitlement and rest.
- **Protection of Young People:** There must be no recruitment of child labour.
- **Safe and hygienic working environment:** Adequate steps must be taken to prevent accidents and injury to health. Hazards inherent in the working environment should be identified and minimised as far as reasonably practicable. Workers must have access to clean toilet facilities and drinking water, and if appropriate sanitary facilities for food storage. Accommodation, where provided, must be clean, safe and meet the basic needs of workers.
- **Fees:** Workers must not be charged any fees or costs for recruitment directly or indirectly, irrespective of the method of payment or who collects it.
- **Legal status:** Workers must be legally authorised to work and have the necessary visas, work permits, and any similar legal documentary requirements.
- **Pay and Benefits:** Workers must be paid at least the national minimum wage and benefits legally required. Wages must be paid on time and in line with laws and employment terms. Wages paid and hours worked (along with any lawful deductions) should be accurately recorded and workers should receive clear and transparent information. Workers must not have unlawful pay deductions and must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure or to keep workers tied to their employer or their jobs. Workers must not be held in debt bondage or forced to work to pay off a debt.
- **Working Hours and Rest:** Workers must work within the legally allowed limits and must have appropriate rest and leave periods. Workers must not be forced to work overtime under the threat of penalty or dismissal and should not be forced to work overtime as a disciplinary measure.
- **Grievance:** A grievance process must be in place by which workers can make complaints, including anonymously, and receive appropriate responses and timely updates on the status of concerns. Concerns may be raised through any process (formal or informal) without fear of retaliation, discrimination or harassment.
- **Discrimination and Harassment:** There must be no threats of violence, discrimination or harassment based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation or any other characteristic prohibited by law. Workers shall be free from any harsh or inhumane treatment or abuse. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are not tolerated. Disciplinary policies and procedures must be clearly defined and communicated.
- **Private employment agencies and labour recruiters:** Employees should be hired directly whenever possible through our in-house talent acquisition team. When the subcontracting of recruitment and hiring is necessary, employees should be hired in line with the relevant business recruitment policy. The business should ensure that all labour agencies it engages operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places employees at risk of forced labour or trafficking for labour exploitation

Responsibility for the Policy

The Board of Directors has ultimate accountability for ensuring this policy complies with NG Bailey's legal and ethical obligations

The Group Financial Director oversees policy implementation, monitoring and effectiveness.

The Group HR Director is responsible for countering modern slavery within the workforce, and the Group Commercial Director has the same responsibilities for our suppliers and the supply chain.

Management at all levels across NG Bailey are responsible for ensuring their teams understand and comply with this policy.

Compliance with the Policy

All individuals working for NG Bailey, either directly or indirectly, must read, understand and comply with this policy. Preventing, detecting and reporting modern slavery is everyone's responsibility. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the NG Bailey legal department or report it in accordance with the NG Bailey Speak Up policy, details of which can be found below.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the NG Bailey supply chains constitutes any of the various forms of modern slavery, raise it with the NG Bailey legal department at legal@ngbailey.co.uk.

NG Bailey aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. NG Bailey is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its own business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the relevant HR Business Partner immediately. If the matter is not remedied, and you are an employee, you should raise it formally in accordance with the NG Bailey Grievance Guide (this can be found at the MyPolicies hub on MyNG Bailey), or by contacting the People Services team at hrandpayqueries@ngbailey.co.uk.

NG Bailey is committed to upholding the highest ethical standards. Failure to comply with this policy may result in disciplinary measures for employees, up to and including termination of employment for serious breaches. Similarly, NG Bailey may review and potentially terminate its business relationship with any individual or organisation working on its behalf who is found to be in breach of this policy. You should note that where appropriate, and with the welfare and safety of local workers as a priority, NG Bailey will give support and guidance to its suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the NG Bailey legal department at our head office (via the postal address on our website) or via email to legal@ngbailey.co.uk.

Communication and awareness of this Policy

Communication of this policy forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary. If there are any elements of this policy that are not understood or you require this policy in an alternative language please contact marketing@ngbailey.co.uk.

NG Bailey's zero-tolerance approach to modern slavery is reinforced in our Code of Integrity for Business Partners and suppliers, contractors and business partners are made aware of NG Bailey's approach at the outset of any business relationship and it will be reinforced as appropriate thereafter.

Reporting your concerns

We encourage you to report any concerns you have about potential modern slavery or human trafficking within NG Bailey or its supply chain. You can raise your concerns through the following channels in line with our [Speak Up](#) policy:

Step One

In the event of an emergency e.g. danger or threat to life, please call the emergency services on 999.

Please report any concerns to your line manager however, if you feel uncomfortable doing so, or if you believe that your line manager is involved in the wrongdoing, you can report the matter to a more senior manager, or even directly to the Board of Directors.

Step Two

We understand that you may find it difficult to Speak Up using internal channels so if you feel unable to raise the matter internally, for whatever reason, you can report externally through NAVEX Global, which is a completely independent organisation. You can use one of the following methods:

- Call the hotline:
 - UK - Call 0800 890011, then dial 833 626 1550
 - Cyprus - Call 800 90010, then dial 833 626 1550
 - Germany - Call 0800 225 5288, then dial 833 626 1550
- Visit the website: www.ngbailey.ethicspoint.com
- Alternatively, contact us internally via concerns@ngbailey.co.uk

Step Three

In any other circumstances you are permitted to report concerns externally, directly to the relevant authorities:

- The Gangmasters and Labour Abuse Authority on 0800 432 0804
- The Modern Slavery and Exploitation Helpline on 0800 0121 700 or at: <https://www.modernslaveryhelpline.org/report>

Signed by

Signature redacted

**Clare Salmon
Group Financial Director**