

# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

## Business Scope

Provision of Civil, Electrical and Mechanical Services to the Commercial, Industrial and Public Sectors, within the UK. These services are coordinated through a head office complex and delivered in the field via skilled and trained operators. The laying of Asphalt Mixes by hand and machine in accordance with National Highways Sector Scheme 16.

## Introduction

### 1. POLICY STATEMENT

1.1 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 ("**modern slavery**"), all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.2 Northavon Group Limited has a zero-tolerance approach to modern slavery within its business and supply chains.

1.3 This policy applies to all persons:

- (a) working for the Group, or on our behalf, in any capacity, including employees at all levels, directors, officers and agency workers; and
- (b) our contractors, external consultants, agencies, third-party representatives, and business partners ("**Suppliers**").

1.4 The Group is committed to:

- (a) acting ethically and with integrity in all our business dealings and relationships;
- (b) implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains; and
- (c) ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015.

1.5 We expect the same high standards from all of our Suppliers. As part of our contracting process, we include specific prohibitions against modern slavery, and we expect that our Suppliers will hold their own suppliers to the same high standards.

### 2. IDENTIFYING MODERN SLAVERY

2.1 Modern slavery may be found in:

- (a) our business and
- (b) our supply chains .

2.2 There is no typical victim of modern slavery, and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery or human trafficking:

- (a) The person is not in possession of their own passport, identification or travel documents.
- (b) The person is acting as though they are being instructed or coached by someone else.

- (c) The person allows others to speak for them when spoken to directly.
- (d) The person is dropped off and collected from work.
- (e) The person is withdrawn or appears frightened.
- (f) The person does not seem to be able to contact friends or family freely.
- (g) The person has limited social interaction or contact with people outside of their immediate environment.

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

### **3. RESPONSIBILITY FOR THIS POLICY AND COMPLIANCE**

- 3.1 The NGL Board has overall responsibility for ensuring this policy complies with the Group's legal and ethical obligations.
- 3.2 The Group Managing Director has primary responsibility for implementing this policy and dealing with any queries relating thereto.
- 3.3 All Group Staff members must comply with this policy.
- 3.4 All Suppliers must comply with this policy.

### **4. REPORTING MODERN SLAVERY**

- 4.1 Group Staff and Suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:
  - (a) If you are a member of Group Staff, your Line Manager; or
  - (b) If you are a Supplier, your primary account manager or business contact with the Group.

### **5. PUBLICATION OF THIS POLICY**

- 5.1 This policy is available to Group Staff via the NGL NIMS System.
- 5.2 This policy is available to Suppliers via the NGL NIMS System.

### **6. BREACHES OF THIS POLICY**

- 6.1 Any Group Staff member who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 The relevant member of the Group may terminate its relationship with a Supplier if it is in breach of this policy. Alternatively, the relevant member of the Group may elect to work with the Supplier to resolve such issues.

### **7. POLICY REVIEW**

- 7.1 The Group Managing Director in conjunction with Procurement, Human Resources and Group Compliance, is responsible for reviewing this policy as necessary to ensure that it meets legal and ethical requirements and reflects best practice.
- 7.2 This policy does not form part of any contract of employment and may be amended at any time.

7.3 Group Staff members are invited to comment on this policy and suggest ways in which it might be improved by e-mailing feedback to the NGL Board or by discussing therewith in person at any time.

***This policy is reviewed and revised at regular intervals, not less than annually, to ensure that it is relevant, up to date and fit for purpose.***

**Signed:**



**Mike Clancy**  
**Group Managing Director**  
**9 January 2023**