

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

POLICY STATEMENT

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 in order 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. It has systems and controls in place to reduce the risk of modern slavery taking place in its own business and in its supply chains.

NG Bailey is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015 and our full modern slavery statement can be found online at www.ngbailey.com.

We expect the same high standards from all persons working NG Bailey or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and suppliers and any others who act in partnership with or on behalf of NG Bailey and whose conduct will reflect upon NG Bailey. NG Bailey specifically prohibits the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. NG Bailey expects that its suppliers will hold their own suppliers to the same high standards.

This policy does not form part of any employee's contract of employment and may be amended at any time.

Responsibility for the Policy

The board of directors has overall responsibility for ensuring this policy complies with NG Bailey's legal and ethical obligations, and that all those under NG Bailey's control comply with it.

The Chief Financial Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and overseeing the auditing of internal control systems and procedures to ensure they are effective. Where our direct employees or workforce are concerned the Group HR Director has primary responsibility for countering modern slavery and our Group Commercial Director has the same responsibilities where our suppliers and supply chain are concerned.

Management at all levels across NG Bailey are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in 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 company secretary at Denton Hall (via the postal address on our website) or to our legal department at legal@ngbailey.co.uk.

Compliance with the Policy

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for NG Bailey or under NG Bailey's control. 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. The full policy is available online at www.ngbailey.com. 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.

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 HR Shared Service team at HRsharedservice@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.

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 Baileys approach at the outset of any business relationship and it will be reinforced as appropriate thereafter.

Breaches of this Policy

If you are concerned about any individual or group operating within your workplace then please report your concerns. We understand that you may find it difficult to speak up directly and therefore if you feel unable to raise the matter with your line manager, HR contact or NG Bailey contact, for whatever reason, you can report externally through Navexglobal 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
- Report it to the Gangmasters and Labour Abuse Authority on 0800 432 0804
- Report it to the Modern Slavery Helpline on 0800 0121 700 or at:
<https://www.modernslaveryhelpline.org/report>.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct and NG Bailey may terminate its relationship with other individuals and organisations working on its behalf if they too breach this policy.

Signature redacted

Jonathan Stockton
Chief Financial Officer

CONTACT

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www.ngbailey.com