

NORTH



Modern Slavery Statement

Modern Slavery Statement

North takes a zero-tolerance approach to modern slavery and human trafficking and understand the responsibilities of our business and of assessing and mitigating the risks across our operations and supply chain.

North does not support or deal with any businesses linked to modern slavery, human trafficking or human rights violations and has systems and processes in place to avoid complicity in these violations throughout our supply chain.

We expect all suppliers to meet the disclosure requirements under any contracts or agreements North has in place to undertake the necessary due diligence to ensure no modern slavery or human trafficking in their operations and supply chains. Our expectations of suppliers are set out in our Supplier Code of Conduct. The key components of our Supplier Code of Conduct are but are not limited to, child labour, freedom of employment, employment relationships, treating employees with respect and dignity, discrimination, wages, working hours, freedom of association and health and safety. Supplier Code of Conduct flags specific human rights indicators including working conditions, discrimination, labour relations, child and forced labour, freedom of association, human rights issues and health and safety standards.

All new and current suppliers are expected to endorse the latest version of our Supplier Code of Conduct which is mandatory & shall be signed before business is undertaken as per our Supplier onboarding process – Procurement Quality Questionnaire (PQQ).

As part of our ongoing due diligence in the supply chain, we will conduct on-site & remote audits to understand how well a supplier has implemented our policies and standards and what the impact has been on their workers. If it is concluded that a supplier needs to improve, we will support them to do so.

Modern Slavery

The Company strictly prohibits the use of modern slavery and human trafficking of any kind in its supply chains. North recognises the responsibility it shares with Suppliers to operate ethically to mitigate and eradicate any cases of human rights violation.

All Suppliers must therefore comply with the Company's Modern Slavery Policy and Human Trafficking Policy. North expects Suppliers to be open and transparent in the way they conduct business with the Company, and to:

- Comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force in the country where they supply goods and services to or on behalf of the Company.
- Represent and warrant that it has not been convicted of any offence involving slavery and human trafficking, nor that it has been the subject of any investigation, inquiry or enforcement proceedings regarding any offence or alleged offence of or in connection with slavery and human trafficking.
- Notify the Company as soon as it becomes aware of any breach or potential breach of the points above, or of any actual or suspected slavery or human trafficking in a supply chain which has a connection with the goods or services provided to the Company.

Training & Awareness

We work with our employees, taking the following actions, to educate and raise awareness of matters concerning Modern Slavery, Human Trafficking and Human Rights violations.

We conduct needs assessments to evaluate the specific needs of North by identifying potential risks of modern slavery in our operations and supply chains.

North provides Modern Slavery Training that focuses on building the capacity and knowledge of the processes and procedures associated with effectively understanding, and identifying victims of modern slavery and human trafficking, covering the following:

- Definition and types of Modern Slavery - including human trafficking, forced labour, debt bondage, child labour.
- Legal Frameworks - International, regional, and national laws, such as the UK Modern Slavery Act 2015
- Identification - How to recognise indicators of modern slavery in the workplace or supply chains.
- Reporting Mechanisms - Clear guidelines on how to report suspected cases of modern slavery.
- Role-Specific Training – Content tailored to different roles (e.g. procurement, HR, management).

Our procurement teams are pivotal in ensuring our suppliers participate in and comply with our ongoing assessment programme, to spot the signs of forced labour (e.g, learn how to report concerns and understand how it affects our business, for example, whether migrant workers are being employed, who may be more vulnerable to risks of modern slavery).

All North employees complete anti-corruption and bribery training, with employees who work in a relevant capacity also required to undertake mandatory modern slavery training. This is repeated every year. The code and the accompanying training make clear that we don't tolerate modern slavery.

Nigel Ewens
North Procurement Director