

# NORTH



## Modern Slavery and Human Trafficking Policy

HRM-POL-021

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## Document Control

Table 1 - Document Control

<b>Document Reference</b>	HRM-POL-021
<b>Issue</b>	3.0
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<b>Release Date</b>	20/05/2025

Table 2 - Version Control

Issue	Author	Approver	Description of Change	Date
0.2	K. McCann	Coreen Bone	Review – no changes	26/03/2025
3.0	K. McCann	Coreen Bone	Transferred from NHR40 to new template. No change to content.	20/05/2025

Table 3 - Approvals

Review Role	Name	Business Role	Comments	Date
Author	K. McCann	People Partner - Project Integration		20/05/2025
Verifier	Chrissie Parry-Jones	People Manager		20/05/2025
Approver	Coreen Bone	Chief People Officer		20/05/2025

Table 4 - Distribution List

Internal/External	Company	Recipient	Communication Method
Internal	North PB	All Colleagues	Knowledge Library upload, People Team Update, Quality Bulletin (via email)

Note: Approvals relate to the most recent version of the document.

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## Terms and Definitions

The following table contains detail of any acronyms, abbreviations or terms used within the document along with the associated definition and any reference material that substantiates the definition.

*Table 5 - Terms and Definitions*

Acronym/Abbreviation/Term	Definition	Reference

## Role, Responsibility and Accountability

The following table highlights the critical roles, and their associated responsibilities and accountabilities applicable to this policy.

*Table 6 - Roles and Responsibilities*

Role	Responsibility/Accountability
Chief People Officer	Policy Owner

## References

The following table details any relevant supporting referential documents, standards or regulations applicable to this policy.

*Table 7- References*

Reference Material	Applicability
The Modern Slavery Act 2015	Regulatory/Statutory Rights

## 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.

In accordance with The Modern Slavery Act 2015, The Company has a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including colleagues at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

## Responsibility for the Policy

This policy explains the procedures through which The Company can maintain its high ethical standards and protect its reputation against any allegations of modern slavery and human trafficking. The Board is committed to ensuring this policy is adhered to. Its successful implementation requires pro-active adoption, you as a colleague are required to read and understand all aspects of this policy and abide by it.

## Compliance with the Policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager OR the Procurement department as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the 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 your manager or report it in accordance with our Whistleblowing Policy as soon as possible. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your manager or the Procurement department.

We aim 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. We are 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 our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

## Communication and Awareness of Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## Breaches of this Policy

Any colleague who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## Related Documents

- [Anti-Bribery and Corruption Policy](#)
- [Whistle Blowing Policy](#)
- [Grievance Procedure](#)
- [Disciplinary Procedure](#)
- [Hospitality Register](#)

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