



# Modern Slavery

Scope: This policy applies to the Company, employees and suppliers

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<b>Owner</b>	Kirk Sideman-Wolter		



## 1. Introduction

Modern slavery is a crime resulting in abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

The Company has a zero tolerance approach to modern slavery and is committed to acting ethically with integrity and transparency in all of its business dealings and relationships. This is achieved by implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within its own business, consistent with its obligations under the Modern Slavery Act 2015.

The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

The Modern Slavery Act covers a wide range of exploitive behaviours including:

- Securing services etc. by force, threats or deception
- Securing services etc. from vulnerable persons
- Slavery
- Trafficking
- Sexual exploitation

## 2. Purpose

The purpose of this document is to define the Company's Modern Slavery Policy. It is intended to provide clear guidance for all those responsible to ensure the policy is correctly followed.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.



### 3. Responsibilities

- 3.1 The author is responsible for writing, ensuring that the technical content is accurate, ensuring that the correct numbering of the procedure is used and defining the circulation list.
- 3.2 The author is responsible for defining the Effective Date and Review Date.
- 3.3 The employee is responsible for following this policy.
- 3.4 The Company is responsible for following this policy.

### 4. Policy

This Policy takes into account, and supports the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001. The implementation and operation of this management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. This policy also links to the company's Ethical Procurement Policy which outlines what NUFORMIX classes as unethical procedures and behaviours, and the consequences of engaging in such activities. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed to ensure its continuing suitability and relevance to the company activities.

The Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (But not limited to):-

- Vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.) through the use of a three part questionnaire.
- Continually audit & review our practices by checking all employees are paid at least the minimum wage and have the right to work;
- We encourage the reporting of concerns and the protection of whistleblowers. Please see the Fraud, Bribery and Whistleblowing Policy for more information.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.



- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking are not taking place in any part of our business or supply chains:

- Completion of audits by internal auditing committee; and
- Use of labour monitoring and payroll systems.

In light of the introduction of the Modern Slavery Act 2015, NUFORMIX has developed and changed its processes to ensure that this is now a mandatory requirement of any contract being awarded.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

For transparency the company will publish the Modern Slavery Policy Statement on its website for the public, consumers, employees, NGOs or investors to view.

#### Responsible Employees

The Modern Slavery Officer (MSO) has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains. Details regarding the MSO can be found at the end of the policy.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.



## 5. Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the Company's compliance code. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager.

Alternatively you can report an issue/concern or gain advice from the following contacts:

The UK government's Modern Slavery Helpline on 0800 0121 700

**Or**

AXA ICAS to anonymously report potential compliance violations Hotline on 0800 587 5674

The Company 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. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

## 6. Training and Communication

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.



## 7. Whistleblowing

The term '*whistleblower*' denotes the person raising the concern or making a complaint.

If an employee knows or suspects any malpractice occurring within the Company, then the whistleblower is encouraged by the Company to raise the matter internally. This allows the Company staff and members in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity. Any form of malpractice that is uncovered will be dealt with in line with the Company's Disciplinary Policy. Please refer to the Fraud, Bribery and Whistleblowing Policy for more information.

## 8. Breach of Policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct. Please refer to the Disciplinary Policy for more information on the procedure.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

## 9. Responsible Persons

Kirk Sideman-Wolter has been assigned the role of MSO. To contact, please see below contact details:

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## 10. Document Revision History

Revision	Author	Change	Date	Approver	Approval Date
1.0	KSW	Responsible person	19/9/18	Board	19/9/18