



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

INTRODUCTION

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 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, OSM Ventilation Limited and The Freedom Group of Companies Limited ("NG Bailey")) is committed to acting ethically and with integrity in all its business dealings and relationships and as a minimum operates in accordance with all local and national laws.



POLICY STATEMENT

This policy outlines NG Bailey's commitment to eliminating modern slavery from its operations and supply chains and sets out the minimum expectations that NG Bailey and all associated parties are expected to adhere. By complying with this policy, everyone working for or on behalf of NG Bailey plays a vital role in upholding these standards. The Modern Slavery Act 2015 ("the Act") defines legal requirements related to modern slavery. Failure to comply with the Act can result in significant penalties for NG Bailey and individuals. In addition, the Act clarifies that a victim's consent to their situation does not automatically excuse non-compliance.

We expect all individuals working for or on behalf of NG Bailey to uphold the same high standards. This includes employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers, and any other third parties who partner with or represent NG Bailey. For the purposes of this policy, we will refer to this collective group as "workers," unless stated otherwise.

We currently manage risk and disclosure obligations through our internal modern slavery working group, a forum of subject matter experts drawn from across the business who collectively monitor risk and drive progress in their respective areas. We have systems and controls in place to reduce the risk of modern slavery taking place in our business and supply chains with full details available in our modern slavery statement which can be found online at www.ngbailey.com.

DEFINITIONS

- **Modern slavery:** The term 'modern slavery' is used to denote situations where one person deprives another person of their liberty to exploit them for personal or commercial gain
- **Human Trafficking:** Human trafficking is the act of recruiting, transporting, transferring, harboring or receiving a person, through any coercive means (such as threat, use of force, deception or abuse) for the purpose of exploitation. Where the victim is under 18 years of age, there is no requirement of coercive means
- **Forced Labour:** Forced labour is any work or services which people are forced to do against their will under the threat of some form of punishment. Almost all slavery practices, including trafficking in people and bonded labour, contain some element of forced labour.

NG Bailey specifically prohibits the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. It is essential that those working within our business and our supply chains are treated with fairness, dignity and respect and are free from discrimination and exploitation.



MINIMUM EXPECTATIONS

For the avoidance of any doubt NG Bailey have set out our minimum expectations for all those working for NG Bailey, on its behalf, or operating within our supply chain, below:

- **Freedom of movement and to choose employment:** Workers must not be subject to any form of forced or compulsory labour. Workers must be able to terminate their employment on reasonable notice and without penalty. Passports, travel, identification or work authorisation papers must not be withheld. Retaining personal documents must not be used to restrict workers' freedom of movement. Workplace, employer or recruiter-operated residences must not be mandatory, and where they are used, workers must not be confined to these residences
- **Freedom of association:** Workers must be free to organise, form and participate in groups, either formally or informally, of their choosing
- **Contracts of employment:** Written contracts must be provided before commencement of work in a language that the worker understands. Workers must have clear terms relating to employment conditions, rights and responsibilities, regular working hours, wages (including lawful deductions), pay cycle, benefits, overtime, leave entitlement and rest
- **Protection of Young People:** There must be no recruitment of child labour
- **Safe and hygienic working environment:** Adequate steps must be taken to prevent accidents and injury to health. Hazards inherent in the working environment should be identified and minimised as far as reasonably practicable. Workers must have access to clean toilet facilities and drinking water, and sanitary facilities for food storage. Accommodation, where provided, must be clean, safe and meet the basic needs of workers
- **Fees:** Workers must not be charged any fees or costs for recruitment directly or indirectly, irrespective of the method of payment or who collects it
- **Legal status:** Workers must be legally authorised to work and have the necessary visas, work permits, and any similar legal documentary requirements
- **Pay and Benefits:** Workers must be paid at least the national minimum wage and benefits legally required. Wages must be paid on time and in line with laws and employment terms. Wages paid and hours worked (along with any lawful deductions) should be accurately recorded, and workers should receive clear and transparent information. Workers must not have unlawful pay deductions and must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure or to keep workers tied to their employer or their jobs. Workers must not be held in debt bondage or forced to work to pay off a debt
- **Working Hours and Rest:** Workers must work within the legally allowed limits and must have appropriate rest and leave periods. Workers must not be forced to work overtime under the threat of penalty or dismissal and should not be forced to work overtime as a disciplinary measure
- **Grievance:** A grievance process must be established that allows workers to submit complaints, including anonymously, and to receive appropriate responses along with timely updates on the status of their concerns. Workers should be able to raise issues through any process, whether formal or informal, without fear of retaliation, discrimination, or harassment
- **Discrimination and Harassment:** There must be no threats of violence, discrimination or harassment based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation or any other characteristic prohibited by law. Workers shall be free from any harsh or inhumane treatment or abuse. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are not tolerated. Disciplinary policies and procedures must be clearly defined and communicated
- **Private employment agencies and labour recruiters:** Employees should be hired directly whenever possible through our in-house talent acquisition team. When the subcontracting of recruitment and hiring is necessary, workers should be hired in line with the relevant business recruitment policy. The business should ensure that all labour agencies it engages operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places employees at risk of forced labour or trafficking for labour exploitation.

REPORTING YOUR CONCERNS

NG Bailey strongly encourages you to raise concerns about modern slavery or human trafficking within NG Bailey or its supply chain internally through one of our available channels. Taking a concern to an outside party (e.g., the media) can have severe implications for NG Bailey, the persons involved and possibly you. By Speaking Up internally using our independent provider, you allow NG Bailey to investigate the matter, protect your anonymity, and take action if necessary.

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 please report it. Speaking Up is encouraged, and employees who Speak Up are protected. Please feel confident that you will not suffer for raising genuine concerns about suspected misconduct. Any form of threat or retaliation will not be tolerated; retaliation is a disciplinary matter.

We understand that raising concerns can be sensitive, therefore, we provide several channels for anyone to Speak Up, however, to report events presenting an immediate threat to life or property and if emergency assistance is needed, please contact the appropriate emergency services. In all other circumstances please follow these steps:

- **Step one:** Raise a concern by contacting your primary point of contact within NG Bailey. This should be your procurement team representative or the day-to-day business owner who manages your relationship
- **Step two:** If you are uncomfortable raising the issue with your direct contact, or if you believe the concern is not being adequately addressed, you can report using one of the following methods:

Call the hotline:

- **UK** - Call 0800 915 1571
- **Cyprus** - Call 00800 7233 2255
- **Germany** - Call 00800 7233 2255

Visit the website: www.safecall.co.uk/ngbailey

- An independent third party administers our Speak Up hotline and website and is available 24 hours a day, 7 days a week, and 365 days a year.
- Alternatively, contact us internally via **concerns@ngbailey.co.uk**
- When raising a concern (in person, by phone or online), please provide as much detailed information as possible to enable NG Bailey to assess and investigate your concern. This could include:
 - The background, history and reason for concern
 - Names, dates, places and other relevant information such as project/contract details, and/or any documents that may support your report.
- **Step three:** In any other circumstances you are permitted to report concerns externally, directly to the relevant authorities:
 - The Gangmasters and Labour Abuse Authority on 0800 432 0804
 - The Modern Slavery and Exploitation Helpline on 0800 0121 700 or at: **<https://www.modernslaveryhelpline.org/report>**



COMMUNICATION AND AWARENESS OF THIS POLICY

Communication of this policy forms part of the induction process for all individuals who work for us, and training will be provided as necessary and relevant for the role. If there are any elements of this policy that are not understood or you require this policy in an alternative language please contact **marketing@ngbailey.co.uk**.

NG Bailey's zero-tolerance approach to modern slavery is reinforced in our Code of Integrity for Business Partners (Available to access on **www.ngbailey.com**) and suppliers, contractors and business partners are made aware of NG Bailey's approach at the outset of any business relationship and it will be reinforced as appropriate thereafter.

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) legal department at our head office (via the postal address on our website) or via email to **legal@ngbailey.co.uk**.

RESPONSIBILITY FOR THE POLICY

The Board of Directors has ultimate accountability for ensuring this policy complies with NG Bailey's legal and ethical obligations.

The Group Financial Director oversees policy implementation, monitoring and effectiveness.

The Group HR Director is responsible for countering modern slavery within the workforce, and the Group Commercial Director has the same responsibilities for our suppliers and the supply chain.

Management at all levels across NG Bailey is responsible for ensuring their teams understand and comply with this policy.



COMPLIANCE WITH THE POLICY

All those working for NG Bailey, either directly or indirectly, must read, understand and comply with this policy. Preventing, detecting and reporting modern slavery is everyone's responsibility. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

NG Bailey is committed to upholding the highest ethical standards. Failure to comply with this policy may result in disciplinary measures for employees, up to and including termination of employment for serious breaches. Similarly, NG Bailey may review and potentially terminate its business relationship with any individual or organisation working on its behalf who is found to be in breach of this policy. 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.

Signed by

Signature redacted

Clare Salmon
Group Financial Director
August 2025

Document Amendment Summary				
This document is uncontrolled once downloaded or printed. Users should ensure they are viewing the latest by checking with the controlled copy published on NG Bailey's Intranet. The document will be reviewed periodically.				
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
Jul-24	0.4	Natalie Wilkinson	Clare Salmon	Additional information included throughout – full policy refresh
Jul-25	0.5	Natalie Wilkinson	Clare Salmon	Additional business entities <u>added</u> and whistleblowing details updated

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