

INTERNAL DOC CONTROL	Document Ref:	NZP011
	Issue:	1
	Issue Date:	05/04/2024
	Aut/Chk/Apvl:	ES/KD/NM
	Review by:	05/04/2027
	Page:	1 of 2

UK MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1. Introduction

- 1.1. nZero Group is committed to exclude slavery and human trafficking within its commercial activities under the UK Modern Slavery Act 2015, and to ensure that its supply chain is also free from such practices, and would never knowingly conduct business with organisations, contractors or employees engaged in such practices.
- 1.2. The term “slavery” describes forced or compulsory labour and includes child labour.
- 1.3. The term “human trafficking” under the act includes commercial sexual exploitation, forced marriage, or the extraction of organs or tissues. However, within this policy document, human trafficking relates primarily to the trafficking of humans for labour purposes.
- 1.4. This policy statement relates to actions and activities during our financial year and is reviewed on an annual basis.

2. Policy

- 2.1. nZero Group does not condone the concept of Slavery, Human Trafficking or abuse of human rights and will not tolerate its practice within the organisation. nZero Group requires our supply chain to embrace the same philosophy and communicates this requirement to our suppliers.
- 2.2. Any supplier who is found to (or suspected of) engaging in any form of slavery or human trafficking shall be reported to the appropriate authorities. nZero Group shall terminate the business relationship with any supplier found directly guilty of such practice. nZero Group shall assist suppliers where possible to help eradicate any slavery practices uncovered within their own supply chain.
- 2.3. This policy has been endorsed by the Board of Directors which gives its full support to its implementation.
 - 2.3.1. Managerial and Supervisory staff have responsibility for the implementation of the policy and must ensure that slavery and human trafficking issues are given adequate consideration in the planning and day-to-day supervision of all work.
 - 2.3.2. All employees and sub-contractors are expected to co-operate and assist in the implementation of this policy.

3. Related Policies

The following corporate and company documents relate to the Modern Slavery and Human Trafficking Policy:

- Whistleblowing Policy
- Code of Ethics & Business Conduct Policy
- Corporate Social Responsibility
- Conflict Minerals Statement

4. Assessing and managing risk

nZero Group's personnel and sub-contractors shall observe the following practices to assess and manage risks:

- Only interview applicants in an approved location.
- Not allow applicants to complete registration documents on behalf of others.
- Evidence to confirm the applicants 'Right To Work' shall be reviewed and accepted prior to being engaged by Thyson or its sub-contractors.
- Not accept money, favours or any gifts at all from applicants or workers.
- Notify a Manager when informed by an applicant or worker that they have paid money to be introduced to the Company.
- Not allow an unauthorised agent or individual to introduce job applicants to the Company.
- Notify a Manager when suspecting an individual of introducing job applicants to the Company for personal gain.
- Not act as landlords or be involved in the provision of accommodation, transport or other paid for services to workers (unless contractually stipulated, recorded and approved at Management level).
- Not allow anyone other than an authorised person to choose which workers are selected for work shifts.
- Not force or coerce workers to work against their will.
- Not threaten or subject workers to physical or mental mistreatment.
- Treat applicants and workers with dignity and respect.
- Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to a Manager immediately.

5. Due Diligence

nZero Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Supplier checks are undertaken on any form of slavery (including forced or compulsory or child labour) at the same time as all other forms of business verification (such as financial and industry body certification).

As part of the overall assessment of risks within our business activities, the risk of Modern Slavery and Human Trafficking within our supply chain will be evaluated.

Within our own organisation, background verification is undertaken on all employees and contracted staff to confirm their right to employment. nZero Group will freely provide help and support to any employee or contracted staff member who has concerns relating to this subject.