

Modern Slavery & Human Trafficking Policy Statement

This statement applies to all companies within or associated to NIC Services Group (referred to in this statement as 'The Group'). The information in this statement refers to the financial year 2017/18.

We are an outsourced facilities management company. The Group has its Head Office in Leeds and operates throughout the United Kingdom.

Definitions

The Group considers that modern slavery encompasses:

- Human Trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or have restriction placed on freedom of movement

Commitment

The Group acknowledges responsibilities in relation to tackling modern slavery and commits to complying with the provisions set out in the Modern Slavery Act 2015 in that we do not trade with or support in any way any organisation, in the United Kingdom or overseas, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required to its responsibilities under the relevant employment legislation.

Supply Chains

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

Potential Exposure

In general, the company considers exposure to slavery and/or human trafficking to be unlikely within our own theatre of operation. Nonetheless, we have taken steps to ensure that such practices do not take place in our own business nor the business of any organisation that supplies goods and/or services to us.

Due Diligence Processes for Slavery and Human Trafficking

The Group has not, in its knowledge, conducted any business with any other organisation which has been found to have involved itself in modern slavery. In accordance with section 54(4) Modern Slavery Act 2015, the Group has taken the following steps to ensure that modern slavery and/or human trafficking is not taking place:

- We limit the geographical scope of our operations to the UK and Europe (Republic of Eire).
- Where possible, we build a long- standing relationship with all our local, national and international suppliers and make it clear what our expectations are in relation to their own business behaviours, we expect them to be akin to ours and for them to have their own modern slavery policy statements reflecting just that.

Measures

- To check how effective we have been ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains we use the following measures:
- We have a system in place where staff are encouraged to 'Speak-up' and report any concerns they may have via a confidential 'Hot line' and 'Email address.' We very much encourage Whistle Blowers.
- We have a vigorous Right to Work staff engagement process that is conducted before we employ staff
- We ensure minimum employment age adhered to in line with current legislation – Generally all staff are 18+ years old.
- We always apply national minimum wage thresholds, in line with current legislation.
- Regular contact with our supply chain partners to ensure their understanding and compliance with our own expectations.
- Access to online training videos for all staff so as to ensure they too know what signs to look for and how to report any concerns via our 'Speak Up' confidential (Whistle Blower) helpline
- We operate a corporate social responsibility policy which incorporates our stance on modern slavery.

This policy takes into account and very much supports the policies, procedures and requirements documented within our Management Systems (the NIC Hub) and ISO9001, ISO14001 and Safety Schemes in Procurement (SSIP).

Compliance Officer

Jon Lightowler, our Business Change Director, has assumed responsibility for our compliance to this policy. All concerns, howsoever raised, regarding modern slavery, should be directed to him in the first instance. He will then take whatever action is deemed necessary in the circumstances prevailing.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed each financial year.

Signed on behalf of NIC Services Group



Simon Tidswell
Company Secretary
NIC Services Group

Dated: 26th June 2018