Modern Slavery and Human Trafficking Policy

Document Information

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Group Companies

This document applies across all Naviam Group Companies unless otherwise stated herein.

Contents

1. Policy Statement 3
2. Policy Objective 3
3. Organisational Structure and Supply Chains 3
4. Policies 3
5. Due Diligence 4
6. Approval 4

Glossary

Company	All group companies within the Naviam brand
ISQMS	Information Security Quality Management System
Group	Naviam Group Companies
Equal Opportunities	the right to be treated without discrimination, especially on the grounds of race, sex, age, or disability.
Human Trafficking	The unlawful act of transporting or coercing people in order to benefit from their work or service, typically in the form of forced labour or sexual exploitation.
Modern Slavery	*when an individual is exploited by others, for personal or commercial gain.*

1. Policy Statement

The group is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not knowingly enter into business with any organisation, in the UK or abroad, which supports or is found to be involved in slavery, servitude and forced or compulsory labour.

2. Policy Objective

We want to be a responsible business that meets the highest standards of ethics and professionalism. We want to ensure that our assessment practices will ensure that can be confident in our statement and position for Modern Slavery and Human Trafficking

3. Organisational Structure and Supply Chains

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited and we procure goods and services from a restricted range of suppliers who normally work with the Group Subsidiary within that region.

4. Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations

- **Whistleblowing Policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- **Employee Contracts & Handbook** – these documents set down the actions and behaviour expected of employees when representing the Company.
- **Business Conduct and Ethics Policy** - This policy defines the behavioural principles and professional standards that guide all employees, contractors, and representatives of Naviam.

5. Due Diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes requesting copies of relevant policies and evaluating the modern slavery and human trafficking risks of each new supplier. The Group also ensures that the appropriate Payroll checks are performed for all Group Subsidiaries.

6. Approval

Approved on behalf of the Group:

Oliver Garthwaite

Group CEO