

APO-0029 NIS Ltd Modern Slavery & Human Trafficking Policy

About NIS Ltd

We are a part of the NIS (Group), and our ultimate parent company is NIS Holdings Ltd. NIS Holdings Ltd which has its head office in the United Kingdom. The group has over 250 employees in the UK and a global turnover of under £36 million.

More information on NIS can be found by visiting www.nisltd.com

Policy Statement

As part of NIS Holdings Group, NIS Ltd is fully supportive of the laws introduced within the United Kingdom through the Modern Slavery Act 2015 to combat slavery and we take a zero-tolerance approach to forced or compulsory labour and the trafficking of person for any purpose.

NIS Ltd expects all employees, suppliers and any third parties that work with NIS to adhere to the same standards and operate with integrity and transparency in all their interactions with their suppliers and sub-tier suppliers and contacts.

NIS Structure and its People

NIS 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 once in our employment. Baseline clearances are completed for all employees which includes proof of identity.

NIS maintains the following policies that are accessible to all staff via an online IMS (integrated management system) portal which are reviewed regularly in line with legislation:

- APO-0013 Code of Ethics Policy
- APO-0011 Anti Bribery Policy
- APO-0026 Anti-Harassment Bullying Policy
- APO-0021 Equality and Diversity Policy
- APO-0038 Whistleblowing

Training

Training in the form of awareness will be delivered to the relevant internal stakeholders who operate within areas of the business that modern slavery may be at a higher risk of being witnessed or observed (E.g. Procurement, Human resources, Commercial teams, Mental health and wellbeing teams).

Supply Chain / Partnerships

NIS Ltd will not carry out business or partnership with any organization which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

NIS Ltd take a risk-based approach based on categories of supply, values of expenditure and geographic location of the supply base. All NIS's new suppliers and service providers confirm their agreement to adhering to the Modern Slavery requirements by way of signature on NIS supplier questionnaires and Category A (Key suppliers) are monitored during NIS annual assessments. The supplier assessments include questions regarding the existence of a Modern Slavery and Ethical Trading Policy, as well as challenging the supplier on their understanding of the topic and the awareness across their business.

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NIS is committed to developing our supply chain and will encourage collaboration to educate and improve.

NIS's commitment to combatting Slavery and Human trafficking.

As of September 2023, NIS Ltd will use the following key performance indicators to measure how effective NIS Ltd has been to ensure that slavery and human tracking is not taking place in any part of the business or within our supply chain.

- All NIS Ltd employees to have received a minimum of baseline clearance.
- Internal key stakeholders to receive awareness regarding slavery and human trafficking.
- Record and review the number of concerns raised regarding slavery or human trafficking within NIS or via NIS assessment of suppliers.
- Record and review the number of category A suppliers who do not have a Modern Slavery policy. (If a supplier does not have a policy or awareness of the topic, this information will be passed to the Assurance team, who will work with the supplier to reduce the risk).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2023.

SIGNATURE DIRECTOR
Steve Rothwell
Managing Director
NIS LTD

