

NIS Ltd Modern Slavery & Human Trafficking Policy

About NIS Ltd

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

More information on NIS Ltd 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. We take a zero-tolerance approach to forced or compulsory labour and the trafficking of persons for any purpose.

NIS Ltd expects all employees, suppliers and any third parties that work with NIS Ltd 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 Ltd Structure and its People

NIS Ltd 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 Ltd 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 first aiders).

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 are aware of Conflict Minerals and understand the term to mean materials taken from mines using forced labour and controlled by armed groups. The most widely cited instances having come from the Democratic Republic of Congo and neighbouring countries, where tin, tungsten, tantalum and gold are mined. Other examples of minerals with potential links to conflict include copper, cobalt, platinum and diamonds.

NIS Ltd is committed to procuring materials purchased from legitimate sustainable sources using Original Equipment Manufacturers (OEM), well known steel producing mills and authorised distributor supply chains.

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

NIS Ltd Modern Slavery & Human Trafficking Policy

Policy, as well as challenging the supplier on their understanding of the topic and the awareness across their business.

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

NIS Ltd.'s commitment to combatting Slavery and Human trafficking.

As of September 2024, NIS Ltd intend to take the following steps to combat slavery and human trafficking:

- Ensure that all relevant employees are exposed to Modern Slavery awareness training
- Continue to monitor and review supplier management and controls regarding slavery and Human trafficking
- Review effectiveness of our current actions and explore opportunities for improvement

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 2024.

SIGNATURE DIRECTOR

Steve Rothwell
Managing Director
NIS LTD



Signed 12/09/2024