

## MODERN DAY SLAVERY ACT 2015 POLICY STATEMENT

Neuven Solutions Holdings Limited, and Neuven Solutions Limited, recognises that slavery and human trafficking remains a violation of an individual's basic human rights. Our aim is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain.

Through our whistleblowing policy which is linked to The Modern Slavery Act 2015 all employees are encouraged to report to the senior management team, any concerns relating to unlawful conduct or any other matter which is deemed serious. The senior management team will discuss the information received to investigate and take appropriate action.

We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. Our Modern-Day Slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### Policies:

This Policy considers and supports some of our other policies, Corporate Social Responsibility, Anti-Bribery, and Whistle-blowing which are held with our procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 and The Information Commissioners Office. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities

### Mitigating Risk:

Neuven Solutions will achieve these aims by our initiative to identify and mitigate risk in the following ways (but not limited to): -

- Stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Audit & review our practices regularly to check all our employees are paid at least the minimum wage and have the correct right to work;
- We encourage the reporting of concerns and the protection of whistle-blowers.
- We will not knowingly support or deal with any business involved in slavery or human trafficking.

We have a zero tolerance to slavery and human trafficking, and we expect all of those in our supply chain and contractors to comply with our values.

### Training:

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to all our employees.



Our employees have access to our Integrated Management System which holds all our policies and processes that underpin our business. Training is given to ensure they have a full understanding of the system and its contents. We regularly update our training to incorporate new contracts and new legislation to ensure all our employees (including senior management) are always fully up to date.

In addition to the above our senior management team work together with the audit team to mitigate any risks. Only our senior management team are authorised to sign contracts and establish commercial relationships if they are satisfied there are not any significant risks of modern slavery, forced labour, or human trafficking in our supply chain.

#### **Measuring our performance:**

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of audits by Directors, Lead Auditor and external auditors
- Use of labour monitoring, compliance monitoring and payroll systems
- Communication and personal contact with key contacts in supply chain to ensure their understanding and compliance of our expectations.
- Onboarding audit check list before contracts are signed.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

#### **Financial Year:**

Neuven's financial year runs from 1st August to the 31st July, therefore this statement covers the period from 1st August 2019 to the 31st July 2020.



John Simmonds CEO  
March 2019

