

ANTI-SLAVERY POLICY STATEMENT

NLG (Wholesale) UK ('the Company')

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Company has a zero-tolerance approach to modern slavery, and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

The Company is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015.

The Company expects the same high standards from all of its contractors, suppliers and other business partners, and as part of the contracting processes, the Company will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and it expects that the Company's suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for the Company or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

Responsibility for the policy

The Company has overall responsibility for ensuring this policy complies with its legal and ethical obligations, and that all those under its control comply with it.

The Company has the primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the

Compliance with the policy

Employees must ensure that they have read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under its control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Employees must notify their line manager OR a company Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains of any supplier tier at the earliest possible stage. If an employee believes or suspects that a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director OR report it in accordance with the Company's Whistleblowing Policy as soon as possible.

Employees should note that where appropriate, and with the welfare and safety of local workers as a priority, the Company will give support and guidance to its suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they should raise it with their line manager or a company Director.

The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the Company's own business or in any of its supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If an employee believes that they have suffered any such treatment, they should inform their line manager immediately. If the matter is not remedied, employees should raise it formally using the Company's Grievance Procedure, which can be found in the current employee handbook.

This Modern (Anti) Slavery Policy and Statement is intended for businesses conducted in all countries, but especially the United Kingdom.

Communication & awareness of this policy

Training on this policy, and on the risk the Company's business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for the Company, and updates will be provided using established methods of communication between the business and employees. The Company's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. The Company may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

Tim Snowden
(Managing Director - NLG Wholesale UK)

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