

ANTI-SLAVERY & HUMAN TRAFFICING POLICY STATEMENT

POLICY STATEMENT

Slavery is illegal and a violation of human rights. There are many forms of Modern Slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement.

These acts involve a person losing their freedom by being exploited by another for personal or commercial gain.

Northey Tech Ltd has a zero-tolerance approach to Modern Slavery.

We are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement systems and controls to ensure Modern Slavery is not taking place in our own business, and in our supply chain by expecting the same high standards from all our contractors, suppliers and other business partners.

POLICY AIM

The Modern Slavery Act 2015 is focused on tackling human trafficking and slavery, but also introduces an obligation on companies to be more transparent in their dealings with supply chains.

COMPLIANCE WITH THE POLICY

We will include within our supplier questionnaire a specific requirement to comply with the Modern Slavery Act 2015.

This Policy applies to all persons working for, or on behalf of Northey Technologies, in any capacity. This includes but does not limit the policy application to; employees, agency workers, temporary staff, agents, contractors, external consultants, third party representatives and business partners.

This policy does not form part of any employee's contract of employment and we reserve the right to amend it at any time.

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of Modern Slavery in any part of our business or supply chain is the responsibility of all those working for us. You are required to avoid any activity that may lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion or modern slavery in any part of our business or supply chain. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

If you believe a breach or suspect a reach of policy has occurred or that it may occur you must notify your line manager or the company managing director as soon as possible.

RESPONSIBILITY FOR THE POLICY

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

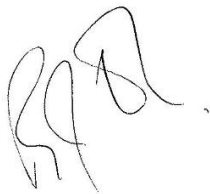
Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

Northey Technology 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 your Line Manager.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.



Bernard Whicher
B.Sc., CEng.
Managing Director.
Northey Tech Ltd.
Dated 25/11/2022