



## **NBJ (LONDON) LTD - ANTI SLAVERY & CHILD LABOUR POLICY**

### **Policy Statement**

NBJ (London) Ltd recognises that modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. All of these activities have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

NBJ have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all of our business dealings and relationships. This will be achieved by implementing and enforcing effective systems and controls to ensure modern slavery does not occur anywhere in NBJ's operations or in its supply chain.

We are also committed to ensuring transparency in all of our business activities and in our approach to ensure modern slavery does not occur in any of our supply chains. This will be consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect these same standards from all our sub-contractors, suppliers and other business partners. In this regard, these stakeholders are expected to comply fully with our Supply Chain Modern Slavery Act Commitment Statement which forms an integrated part of our contractual relationship with them.

The scope of this Policy applies to employees at all levels, directors, officers, agency workers, seconded workers, volunteers, sub-contractors, agents, external consultants, third party representatives and business partners.

### **Responsibility for the Policy**

- The Directors of NBJ have an overall responsibility for ensuring that this Policy complies with all legal and ethical obligations as well as ensuring that all employees and our supply chain comply with it. They collectively have day to day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it and periodic auditing of relevant internal control systems and procedures to ensure they are effective in countering modern slavery.
- Management at all levels are responsible for ensuring those who report to them understand and comply with this Policy by way of adequate and regular training on it and the issue of modern slavery in supply chains.
- NBJ Director's will seek to encourage comments, suggestions and queries from employees and our supply chain on the Policy, its implementation and content. This will enable effective review of the document.





### **Child Labour**

- We adhere to and require all of our suppliers to comply with the standards set out by the International Labour Organisation and current UK Children (Protection at Work) Regulations, as regards the employment of children and young people. In particular:
  - children must not be recruited before they have reached the age of completion of compulsory schooling, and in any case not before the age of 16.
  - and those under 18 must not be required to perform hazardous duties.

### **Compliance with the Policy**

All employees, sub-contractors, suppliers and other business partners must:-

- Ensure they read, understand and comply with this Policy;
- Prevent, detect and report modern slavery in any part of the NBJ business or its supply chains;
- Avoid any activity that might lead to or suggest a breach of this Policy;
- Raise concerns with a line manager or director if a breach or any issue under this Policy is suspected or believed to have occurred at the earliest opportunity.

It is also Company policy to ensure that 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 business. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern under this Policy.

### **Communication and Awareness of this Policy**

Training in respect of this Policy and the risks to the business from modern slavery in its supply chain forms part of the induction process for all employees and contractors. Suppliers and business partners will also be made aware of our zero-tolerance approach to modern slavery at the outset of our business relationship with them and reinforced appropriately thereafter.

### **Breaches of the Policy**

Any employee who, after investigation, is deemed to be in breach of this Policy will be subject to disciplinary action which may result in his/her dismissal.

The business relationship with sub-contractors, suppliers and business partners will be terminated in the event of a breach of this Policy

Signed:

Date: 05.05.2023

Position:

Managing Director

Company: NBJ (London) Ltd



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