

## **Modern Slavery Policy**

#### Introduction from the Directors

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Our employees are alert to the risks and are expected to report their concerns, and management are expected to act upon them.

#### **Organisations Structure**

NWG Group Limited, is an office refurbishment company. The head office is based in Wales, with another office situated in the Midlands.

#### **Our Business**

The principal activity of our business is the refurbishment and refit of office facilities (plus related works) throughout the UK.

## **Our Supply Chains**

Our supply chains include the sourcing of various building products predominately from UK based suppliers.

#### **Our Policies on Slavery & Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy 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 any where in out supply chains.

### **Due Diligence Processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk we:

- Build long-standing relationships with local suppliers and make clear our expectations of business behaviour;
  - Have a policy of "knowing our customer" to ensure that we are contracting with appropriate businesses;
  - With regards to national or international supply chains, our point contact is
    preferably with a UK company or branch and we expect these entities to have
    suitable anti-slavery and human trafficking policies and processes. We expect each
    entity in the supply chain to, at least, adopt a 'one-up' due diligence on the next link



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in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

#### **Supplier Adherence to our Values & Ethics**

We have zero tolerance to slavery and human trafficking. We expect all 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 briefings to our Directors and employees.

## **Our Effectiveness in Combating Slavery & Human Trafficking**

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
- · Use of staff monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain

and their understanding of, and compliance with, our expectations.

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 current financial year.

Name	Position	Signature	Date
Jeff Williams	Director	JH.	15/03/24
Gary Conlan	Director	Clan	15/03/24