



Modern slavery and human trafficking policy statement

Introduction

This document contains Nueco Group Limited's policy on modern slavery and human trafficking and its statement under section 54 of the Modern Slavery Act 2015.

Policy

Forced or compulsory labour, human trafficking and other kinds of slavery represent some of the gravest forms of human rights abuse in any society. We all have a responsibility to be alert to the risks in both the Nueco Group Limited business and our supply chain.

Nueco Group Limited is committed to conducting all aspects of its business in an ethical and transparent manner. We acknowledge our duties and responsibilities under the Act.

Nueco Group Limited values require that all workers are treated with dignity and respect. We are fundamentally opposed to slavery, human trafficking, forced labour, debt bondage, the sale or exploitation of children and all exploitative practices in the workplace.

Nueco Group Limited requires that all contractors and suppliers do not engage in any such practices, and do not knowingly themselves contract with third parties which do.

Nueco Group Limited values require that it terminates business relations with any contractor or supplier found to be in breach of anti-slavery and human trafficking obligations.

Modern slavery statement

This statement is made by Nueco Group Limited on its own behalf.

Our statement sets out the approach that Nueco Group Limited have either already taken or intend to take during the future to prevent modern slavery and human trafficking in its business and supply chains.

We are seeking to apply the policies and procedures detailed in this statement across relevant parts of Nueco Group Limited but acknowledge it may take time to achieve consistent standards, especially overseas and within our supply chains.

Nueco Group Limited employee overview

We are committed to providing a great place to work and this is at the heart of our business strategy. We comply with local minimum age and wage laws and do not employ child labour.

All our employees are:

- paid by bank transfer; we do not allow payment to be made into third party bank accounts, thus minimising the risk of forced or compulsory labour; and
- vetted for the right to work in the country where they are employed. Where employees require a work permit/VISA we ensure they have the necessary documentation in place.

As a responsible employer, we take the welfare of our employees seriously. Our whistleblowing policy encourages employees to report wrongdoing (including exploitation) in any form.





Supply chain overview

The Nueco Group Limited business model means that we work in partnership with a number of sub-contractors and other suppliers to fulfil our commercial and contractual obligations to our customers.

In common with many companies operating in the construction industry, our supply chain is complex; there are often many tiers of suppliers between Nueco Group Limited and the source of the raw materials and labour we use.

We have adopted various procedures to ensure that both our existing and potential supply partners understand our values, standards and requirements regarding the prevention of modern slavery and human trafficking within supply chains.

We are aware that the biggest slavery and human trafficking risks for Nueco Group Limited lie in our supply chains, particularly the supply chains of our sub-contractors in higher risk jurisdictions.

As part of our sub-contractor due diligence procedures, we have incorporated an additional vetting process into our sub-contractor due diligence procedures used within the UK. All potential new sub-contractors who go through our 'Doc-hosting' pre-qualification process are now required to sign up to our 'anti-slavery and human trafficking supply chain commitment' (the "Supply Chain Commitment") before they can be classed as an 'Nueco Group Limited approved sub-contractor'.

Training and awareness

Relevant UK employees within the group are required to complete a modern slavery and human trafficking e-Learning training module. This course covers the requirements of the Act, Nueco Group Limited's obligations, our supply chain expectations and the potential consequences for non-compliance. We maintain a proactive approach to ensuring full compliance for this e-Learning training module from the relevant UK employee groups, and that all new employees joining the business, in one of these relevant roles, complete the training module within a 90-day window from commencement of their employment.

Ongoing review

We will continue to review and evolve our anti-slavery and human trafficking policies and procedures over time, as we gradually make progress in the adoption of a common approach throughout our businesses.

Failure to comply

A failure to comply with the Act, and/or this policy statement will be deemed to be a material breach of the terms of our standard commercial agreements and contracts of employment.

This statement is made pursuant to Section 54(1) of the Act and constitutes Nueco Group Limited's slavery and human trafficking statement.





"All our company policies are reviewed quarterly to ensure that Nueco Group Limited remains knowledgeable, learned and abreast with the latest industry legislation. We employ highly trained professionals and outsource consultancy where applicable to ensure the highest standard of consultation is received. I personally communicate each policy to all of our members to ensure anyone representing Nueco Group Limited are well briefed, attentive and working safely."

Tom Gibbons

Tom Gibbons

Managing Director

Rev. – April 2022

