



Node4 Slavery and Human Trafficking Policy

Node4 Employees

Policy

Public

10/10/2019

IN ACCORDANCE WITH SECTION 54(1) OF THE MODERN SLAVERY ACT 2015

Slavery and human trafficking remain a hidden blight in our global society. Modern slavery is a serious crime and is a violation of fundamental human rights. By definition, slavery is the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We are committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We are committed to acting ethically and with integrity in all our business relationships and to implement and enforce the effective system and controls to ensure that slavery and human trafficking is not in our business.

POLICY STATEMENT

This policy applies to all persons working for us or on our behalf in any capacity, including employees, directors, sub-contractors and suppliers.

Node4 prohibits the use of modern slavery and human trafficking in our operations and supply chain. We continue to remain committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

COMMITMENTS

We have zero-tolerance for slavery and human trafficking. We expect all those in our supply chain and our customers to comply with our values: -

- We expect our suppliers and customers have anti-slavery and human trafficking policy in place, and if no company policy is in place that they have an awareness of Node4's company values.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain
- We take a risk-based approach to assess suppliers, contractors and other third parties we conduct business with through our supply chain.
- As part of our risk assessment and due diligence process, we will consider whether circumstances warrant us carrying out audits for their compliance with modern slavery.
- We will further develop initiatives to raise awareness of modern slavery and human trafficking.

TRAINING

To ensure a level of understanding of the risks of modern slavery and human trafficking we ask all our employees to read and sign to say that they understand Node4's company values and that slavery and human trafficking is not an acceptable practice in our business. Node4's policy on slavery and human trafficking is available public document on our website.

MONITORING

We have the following mechanisms for monitoring how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business: -

- Use of labour and monitoring of payroll systems;
- Request copies of the supplier's policy on Slavery and human trafficking as part of Node4's ethical supply chain policy.

COMPLIANCE

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 or under our control. You must notify Compliance or HR if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about modern slavery in any parts of our business or the supply chain and will support anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting.

Node4 may terminate relationships with organisations that are in breach of this policy.