

## MODERN SLAVERY POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Navartis Ltd have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy has been approved by the Board and applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, 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 may amend it at any time.

### RESPONSIBILITY FOR THE POLICY

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The HSQE Consultant has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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

### COMPLIANCE WITH THE POLICY

This statement focuses specifically on Navartis' compliance with the Modern Slavery Act 2015 (the Act) and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organisation or its supply chains. One of our Company's most valuable assets has always been its reputation for integrity and fairness. Maintaining this reputation within our market is an essential pre-requisite to our continued success.

### Our Supply Chains

Our supply chain includes, but is not limited to, training companies and suppliers of PPE. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally-compliant and professional manner and also expect our suppliers to promote similar standards in their own supply chain.

### Our Policies on Slavery and Human Trafficking

Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.

All employees must be provided with a clear contract of employment, which complies with local legislation.

All employees must be treated in a fair and equal manner and with dignity and respect.



Any form of discrimination, victimisation or harassment on the grounds of marital or civil partnership status, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, having or not having dependants, religious belief or political opinion, age, trade union activity and offending background should be prohibited.

All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions. Suppliers should observe the provisions of the International Labour Organisation such that any young persons under the age of 18 should not be employed to work at night or for any hazardous work and their employment should not harm the young person's education, health or physical, mental, moral or social development. No young persons may be employed below the age of 16.

All slavery and human trafficking laws must be complied with including, but not limited to, the UK Modern Slavery Act 2015. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in the UK or elsewhere, both internally and within their supply chains and other external business relationships. 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.

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

Navartis ensure strict compliance checks are carried for all candidates it supplies. We verify the identity of each worker and their right to work before supply commences.

Navartis is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in good faith will be treated confidentially and without fear of retaliation.

### **Training**

All staff within Navartis are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. All our policies and procedures are reviewed frequently to ensure our colleagues have access to any additional information and support they may require with regard to human trafficking, forced labour, servitude and slavery. All staff are expected to 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 or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible 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 any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Work-Safe Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your manager.



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. We are committed to ensuring 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 our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

#### COMMUNICATION AND AWARENESS OF POLICY

Training on this policy, and on the risk our business may face from modern slavery in its supply chain will be given where needed.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### 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 organisations working on our behalf if they breach this policy.

**This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes Navartis Ltd's slavery and human trafficking statement in respect of its current financial year ending 31<sup>st</sup> March 2019.**



---

Jim Sloan  
Managing Director