



Modern Slavery Policy

NRC WWS Ltd is committed to driving out acts of modern-day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain the company.

As part of the company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains. This Policy applies to all staff, contractors, clients, suppliers and other interested parties within the business and is communicated throughout. Copies of this Policy are available to all interested parties.

The company is committed to its obligations under legal compliance, ethical standards and fundamental human rights as set out by the principles of the ILO/UN Guiding principles and raising awareness of modern slavery issues.

The following are examples of how to spot potential Slavery situations:

- appear to be under the control of someone else and reluctant to interact with others
- not have personal identification on them
- have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work
- not be able to move around freely
- be reluctant to talk to strangers or the authorities
- appear frightened, withdrawn, or show signs of physical or psychological abuse
- dropped off and collected for work always in the same way, especially at unusual times, i.e. very early or late at night.

It is the responsibility of all individuals to report any concerns of Modern Slavery to the Managing Director (responsible also for the prevention of Modern Slavery in the business). The company will ensure that there are no repercussions for anyone who is raising concerns. The company are committed to ensuring that they take all concerns seriously and raise concerns, where appropriate, to the Modern Slavery Helpline or other relevant authority / organisation.

The company will address and prohibit any practices that are known to contribute to the risk of modern slavery. The company will, at the next Management Review:

- Review business activities and identify the presence of associated contextual risk factors which will be split into into three categories: country and sector context, workforce demographics, and the characteristics of risk management processes or controls.
- Where multiple modern slavery risk factors are present, implying greater risk to workers, further investigations will be necessary and more vigorous measures may need to be developed in response.

This policy statement will be reviewed annually and published.

This Policy takes into account and supports, the policies, procedures and requirements documented in our Rail Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. The implementation and operation of this management system underlines our commitment to this policy.



Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Managing Director to ensure its continuing suitability and relevance to the company activities.

Signed: 

Title: Managing Director

Date: 10/02/2023