NWM Anti Slavery and Human Trafficking Policy

October 2026

NWM does not tolerate slavery, human trafficking, forced labour or other forms of labour exploitation. People must be free to choose their work and raise concerns without intimidation. This policy sets the standards we require in our business and expect in our supply chains.

1 Scope and responsibilities

This policy applies to NWM Commercial Ltd and NWM Contracting Ltd, their directors and staff, and people acting on their behalf. It covers our work with Umbrella employees, CIS subcontractors, recruitment agencies, suppliers and other business partners.

The boards are responsible for oversight. The Compliance Manager is responsible for implementing the policy, receiving concerns and coordinating appropriate action. Managers must make sure their teams understand the requirements and receive training appropriate to their roles.

This policy sets organisational standards. It does not replace anyone's statutory rights, contractual payment rights or the protections available to whistleblowers.

2 What we prohibit

- Work obtained through threats, deception, coercion, debt bondage or abuse of a person's vulnerability.
- Trafficking, forced or compulsory labour, slavery, servitude and unlawful child labour.
- Withholding a person's identity documents, wages or access to their bank account to control or exploit them.
- Threatening someone with loss of work, violence or other retaliation to prevent them leaving or seeking help.

Workers must not be required to surrender original identity documents as a condition of remaining in work. Legitimate checks and lawful deductions must be explained and must not be used to restrict freedom or conceal exploitation.

3 Risks in our work

Temporary labour supply chains can involve several businesses and people with different responsibilities. Risk may arise where a person cannot speak for themselves, does not understand their terms or pay, is controlled by another person, or cannot access their own money or documents.

Warning signs include several unrelated workers being directed to use the same contact or bank details without a clear explanation, unexplained deductions or debts, a third party answering every question, or a worker appearing frightened of an accompanying person. A warning sign requires careful enquiry; it is not proof of exploitation or a reason to make assumptions based on nationality or background.

4 Prevention and proportionate checks

Our working procedures must support the following requirements:

- Identify the organisations in the relevant supply chain and assess concerns before establishing or continuing a business relationship.
- Carry out the identity, right-to-work, engagement and payment checks appropriate to the relationship and applicable law.
- Explain terms, NWM's margin, relevant deductions and payment arrangements in a way the worker can understand, with a route for questions.
- Check unusual requests to pay someone other than the worker or change contact and payment details. Investigate proportionately and protect the person's privacy.
- Communicate our standards to agencies, contractors and suppliers and use appropriate contractual commitments against forced labour and trafficking.
- Apply further checks where the risk justifies them, keep relevant records securely and escalate unresolved concerns to the Compliance Manager.

Checks must be proportionate and must not be used to discriminate against workers or automatically withhold money that is lawfully due. A compliance badge or completed form does not remove the need to respond to signs of exploitation.

5 How to raise a concern

You do not need to prove that exploitation has occurred before raising a concern. If it is safe to do so, contact NWM and ask for the Compliance Manager:

NWM, Merchant Court, Milburn Road, Bournemouth, BH4 9HJ.
0330 333 4240 | enquiries@nwm.uk.com

Tell us how and when it is safe to contact you. If your concern involves that manager, ask for a director instead. You can also contact the police or a specialist service directly without first contacting NWM.

If someone is in immediate danger, call 999. For non-emergency police assistance, call 101. The UK Modern Slavery & Exploitation Helpline is available on 08000 121 700, with information and reporting at modernslaveryhelpline.org.

Do not confront a suspected exploiter or put yourself or another person at risk. Preserve information you already hold safely, but do not conduct your own investigation or collect unnecessary sensitive information.

6 Responding and protecting people

We will take concerns seriously, assess immediate safety risks and involve appropriate specialist support or authorities where necessary. We will consider the wishes and safety of the person affected and any legal reporting duties.

Information will be shared only with those who need it for a lawful response. We cannot promise absolute confidentiality where a disclosure is needed to protect someone or comply with the law.

We will not penalise someone for raising an honest concern on reasonable grounds, even if it is not substantiated. Anyone who believes they have suffered retaliation should tell a director promptly. Statutory whistleblowing protections remain available where applicable.

7 Training and communication

Staff induction and role-appropriate refresher training must cover warning signs, safe escalation, confidentiality and the importance of listening to the worker. Managers must make sure staff know who to contact and how to respond without increasing risk.

Our expectations must be communicated to relevant agencies, suppliers and business partners when a relationship begins and reinforced when risks or circumstances change. People paid through NWM must be able to find this policy and the contact route.

8 Breaches and remediation

Breaches by staff may result in disciplinary action, up to and including dismissal, following the appropriate procedure. A breach by a supplier or business partner may require corrective action, suspension or termination of the relationship, subject to law and contract.

The response must consider the effect on affected workers. Ending a commercial relationship should not be treated as a substitute for safeguarding people, addressing unpaid entitlements or cooperating with an appropriate investigation.

9 Monitoring and review

The Compliance Manager must review the operation of this policy and report material concerns to the boards. Review should consider concerns raised, response times, training, checks on higher-risk relationships and whether corrective action was effective. A low number of reports alone is not evidence that exploitation is absent.

This policy will be reviewed at least annually and when material changes in the business, law or identified risks require it. The version date identifies the wording in use once approved.

10 Annual modern slavery statements

Where a company is required to publish a statement under section 54 of the Modern Slavery Act 2015, that statement must describe the steps actually taken during the relevant financial year and receive the required approval and signature. This standing policy is separate from that annual statement.

Approval record

Approved for NWM Commercial Ltd and NWM Contracting Ltd by:

Name: Graham Williams

Position: Director

Approval date: 27 October 2026