

This N+P Group Policy and represents the N+P Group's direction to the business on this topic. Compliance with this Policy is mandatory through aligning N+P Group's processes and people's behaviours to the commitments below.

Scope

This statement sets out N+P's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

N+P recognises their responsibility to take a robust approach to slavery and human trafficking. Our organisation is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

N+P recognises the high level of risk of this type of crime in the Energy & Recycling sector and proactively participates as a member of the Slave Free Alliance and the associated waste & recycling working group to prevent and mitigate the risks of modern slavery.

We ensure our temporary workforce supplier has resilient processes in place to mitigate the risk of modern slavery and ensure information is accessible to colleagues in a broad range of languages.

Process owner

This process is owned by the Human Resource department.

Organisation's Structure and Countries of Operation

This statement covers the activities of N+P Group who operate and specialise in the production and supply of waste derived alternative materials for various industries.

We currently operate in the following countries:

- Netherlands and the United Kingdom in manufacturing and trading environment
- Germany, France & Italy in a trading environment

Our Supply Chain

N+P has a vast majority of suppliers predominately based in either the Netherlands or United Kingdom. Our suppliers provide material for processing into a fossil fuel alternative or material that is treated to recover commodities that are traded.

Risks

Modern slavery can impact the energy and recycling industry in various ways, and has historically been targeted by criminals operating in this area through the use of illegitimate labour agencies. It is therefore vital that we keep informed of the latest risks and best practices in mitigating and addressing them.

We deem our main risks to be (examples):

- Our use of labour agencies
- Varying levels of visibility across our supply chain, particularly beyond the first tier.
- Language skills across certain parts of our workforce

Due Diligence

To address these risks, we conduct numerous activities, such as:

- Ensuring that agency personnel get the same pay rate as permanent staff
- Temp-to-perm process receives detailed review of employee details & risk to modern slavery
- Working towards audits of our supply chain / suppliers
- Taking steps to improve substandard suppliers' practices (as outlined in the anti-slavery policy)
- Duplicate record checks on employee data (addresses, contact details and bank accounts)

Our Policies and Responsibilities

N+P is committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our business policies reflect our commitment to acting ethically with all our business relationships.

The following policies support our business directive to remove any presence of modern slavery or human trafficking.

- N+P Anti-Slavery Policy - will ensure N+P eradicates any modern-slavery practices in the business and throughout our supply chain through robust due-diligence, procedures and our colleagues awareness.
- N+P Whistleblowing Policy - this provides a channel for colleagues to raise concerns of a modern slavery channel either to their line manager or confidentially to our independent hotline (Safecall).
- N+P Code of Conduct Policy - outlines the actions and behaviour expected of our colleagues when representing N+P. The policy strives to maintain the highest standards of colleague conduct and ethical behaviour when operating abroad and managing our supply chain.
- Procurement General Purchasing Terms & Conditions - help to ensure that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Training

N+P partner with specialist organisations to ensure robust training is available and delivered to line managers and key support function colleagues. Our colleague training will cover fundamentals like;

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties
- what external help is available

Effectiveness

We continuously evaluate the effectiveness of our steps to address modern slavery risks in our business and supply chain, and seek to continuously improve our efforts.

In 2023, N+P completed a Gap Analysis with our partner Slave-Free Alliance.

During 2024 N+P will be investing in our front line & middle managers to be trained in identifying modern slavery indicators to enable N+P to support anyone at risk of exploitation.

Next year, we hope to develop an escalation process, which will enable us to have a clear framework in which to escalate a potential instance of modern slavery either in our business or supply chain.

Awareness-raising programme

Alongside colleague training and investment, N+P raises awareness of modern slavery issues by displaying posters across our sites outlining the following information.

The basic principles of the Modern Slavery Act 2015;



- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes N+P Group's Modern Slavery and Human Trafficking statement for the financial year ending 6th April 2024.

Change Log

Version	Changes	Date
V0.2	2024 update following SFA review.	07/04/2024

Approvals

NAME	POSITION	Stage	Signature
James Newby	HRBP	Prepared & Released	
Hilde Nuyts	Chief HR Officer	Approved	

Document ref.: NPG-HR-001
Date: 2022-07-10
Issue: 01
Document Class: Internal

Department: HR
Document owner: JN
Page: 3/3

Uncontrolled if printed