

Modern Slavery and Human Trafficking Policy and Statement

Procurement

Class 1 – General B2B Use / Public

Version 4.0 - 06/05/2026

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Version Control

Current Version

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Version History

Version	Date	Author	Description of Changes
DRAFT	09/06/2022	PS	New integrated Policy & Statement Prepared.
1.0	17/06/2022	KB	Approved for Release
2.0	13/06/2023	AC	Annual Review minor amends
2.0	18/07/2023	TA	Approved for Release
3.0	08/5/2025	SB	Annual review minor amends inc new approver
4.0	13/5/2025	Stuart Whittaker, Group Procurement Director	Approved for release
4.0	06/05/2026	Stuart Whittaker, Group Procurement Director	Approved for release

1 Purpose & Objectives

This policy sets out Nasstar's commitment to preventing modern slavery, human trafficking, forced labour, and all forms of servitude within its business operations and supply chains. It establishes the principles, minimum requirements, and governance arrangements to ensure compliance with the **UK Modern Slavery Act 2015** and equivalent legal obligations in other jurisdictions where Nasstar operates.

The objectives of this policy are to:

- Prevent modern slavery and human trafficking within Nasstar and its supply chains
- Promote ethical working practices and responsible sourcing
- Ensure legal and regulatory compliance
- Provide clear mechanisms for raising concerns and responding to suspected breaches

This policy supports Nasstar's Integrated Management System (IMS) objectives relating to ethical governance, risk management, and regulatory compliance.



2 Scope

This policy applies to:

- All Nasstar Group companies and operating divisions
- All employees, contractors, agency workers, and temporary staff
- All suppliers, partners, and third parties providing goods or services to Nasstar
- All geographic locations in which Nasstar operates, including the UK and overseas locations such as Malaysia

2.1 Compliance Obligations

This policy supports compliance with the following obligations:

- UK Modern Slavery Act 2015
- Applicable anti-slavery and human trafficking laws in countries where Nasstar operates
- Nasstar's Supplier Code of Conduct
- Nasstar's Whistleblowing Policy
- Relevant ethical and governance obligations within Nasstar's IMS

3 Breach Management, Exceptions & Escalations

Nasstar operates a zero-tolerance approach to modern slavery and human trafficking.

Any suspected or actual breach of this policy must be reported immediately. Reports may be raised through:

- Emergency services, where there is immediate risk
- The UK Modern Slavery Helpline (0800 0121 700)
- The UK Home Office online reporting tool
- The Nasstar Whistleblowing process
- Line management or the HR / People Team
- Email: Compliance@nasstar.com

All reports will be assessed promptly, with an initial assessment conducted within 72 hours of notification.

No exceptions to this policy are permitted. Formal exceptions cannot be granted where they would weaken compliance with modern slavery legislation or this policy.

Confirmed breaches may result in disciplinary action in accordance with Nasstar's Disciplinary & Capability Procedure and/or supplier remediation or contract termination.

4 Policy Statement

Nasstar:

- **Must not** tolerate modern slavery, human trafficking, forced labour, or compulsory labour in any form
- **Must** conduct its business ethically, transparently, and in compliance with applicable law
- **Must** assess and manage modern slavery risks within its operations and supply chains



- **Must** ensure employees are trained to recognise and report potential modern slavery risks
- **Must** require suppliers and contractors to comply with applicable modern slavery legislation and Nasstar's Supplier Code of Conduct

4.1 Modern Slavery & Human Trafficking Statement

Nasstar is a cloud services specialist delivering managed cloud, communications, and network services. Most suppliers are established UK and global technology providers, with low inherent modern slavery risk. Our due diligence controls include:

- Supplier Code of Conduct issued during onboarding
- Risk-based supplier assessments
- Right-to-work checks for all employees
- Ethical recruitment and employment practices
- Incident reporting and whistleblowing mechanisms

Nasstar is committed to strengthening its approach to preventing modern slavery through ongoing supplier engagement, training, governance reviews, and risk-based improvements.

5 Roles and Responsibilities

Board & Senior Management

- Provide oversight and strategic commitment to preventing modern slavery
- Approve this policy and the annual Modern Slavery Statement

Employees & Contractors

- Remain alert to potential signs of modern slavery
- Report concerns promptly using available channels

Suppliers & Third Parties

- Comply fully with the Modern Slavery Act 2015
- Adhere to the Nasstar Supplier Code of Conduct
- Maintain ethical, transparent, and auditable supply chains

First Line – Doing the work	Second Line – Setting the rules and checking	Third Line – Independent assurance
<p>Business Units, Process, Risk and Asset Owners:</p> <ul style="list-style-type: none"> • Own and manage modern slavery risks within their areas. • Ensure procedures and controls are followed. 	<p>Procurement and People</p> <ul style="list-style-type: none"> • Procurement: Maintain policy oversight. Manage supplier risk assessments and onboarding controls. • People Team: Ensure fair working practices and employee training. 	<p>Internal Auditors and Risk & Audit Committee</p> <ul style="list-style-type: none"> • Provide independent assurance over policy effectiveness, where applicable. • Report findings to senior management and the Board.



6 Policy Governance

This policy is to be reviewed on a minimum of an annual basis or in line with business or regulatory landscape changes.

All stakeholders under the scope of this policy are obligated to promptly report any breaches by emailing Compliance@nasstar.com

Definition of non-adherence includes, but is not limited to:

- Failure to follow any stated rule, procedure, or protocol outlined within this policy.
- Deliberate circumvention of control measures, processes, or systems established to support this policy.
- Negligent actions or omissions that result in a breach or violation of the policy's intent or requirements.

Any confirmed instance of non-adherence to this policy, regardless of whether it results in immediate loss or harm to the Company, will be treated as a serious matter of misconduct and may result in the trigger of the Nasstar's formal Disciplinary Procedure.

7 Definitions & Acronyms

- **Modern Slavery** – Exploitation involving forced labour, servitude, or human trafficking
- **IMS** – Integrated Management System
- **GRC** – Governance, Risk & Compliance

