

## **NICC Standards Limited – Modern Slavery & Human Trafficking Statement**

### **Introduction**

This statement sets out NICC Standards Limited'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. This statement is reviewed, updated as required and approved by the organisation's Board of Directors prior to the commencement of each Financial Year.

As part of the UK Telecommunications industry sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### **Organisational structure and supply chains**

This statement covers the activities of NICC Standards Limited:

NICC Standards Limited facilitates technical fora for the UK communications sector that develop interoperability standards for public communications networks and services in the UK. It is an independent organisation owned and run by its members.

### **Countries of operation and supply**

The organisation only operates within the United Kingdom although the interoperability standards it develops may be referenced or used in other countries.

### **Responsibility**

Responsibility for the putting in place and reviewing the organisation's anti-slavery policy rests with the Board of Directors.

### **Relevant policies**

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Whistleblowing policy

The organisation encourages all its members, customers, participants in its activity and other business partners (collectively, "Stakeholders") to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for Stakeholders to make disclosures, without fear of retaliation. Stakeholders who have concerns can contact a member of the Board of Directors.

- Supplier code of conduct

The organisation is committed to ensuring that its 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. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

- Agency workers policy

The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

### **Due diligence**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

### **Board approval**

This statement has been approved by the organisation's Board of Directors on the date below written.

Director's signature: 

Director's name: Andrew Rawnsley

Date: 23 January 2019