Policy Document

Modern Slavery Policy

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Version 5.0

All NOC Policies and Procedures apply to NOC Innovations unless otherwise stated.

Document Control

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Policy Owner:	Director of Operations
Updates:	The effectiveness of policies and procedures is monitored on an ongoing basis. This ensures that regulatory/legal change, incident occurrence and/or stakeholder engagement is considered and incorporated as the policy owner are subject to an effectiveness review every 3 years, records of which will be kept by the Legal & Governance Team. For further information please contact governance@noc.ac.uk
Deletion Date:	When a policy is superseded or no longer required.

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1. Scope

This policy applies to all persons working for or on behalf of NOC in any capacity, including employees at all levels, trustees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives, business partners and those on NOC-managed Research Vessels. The policy outlines the NOC approach to the issue of modern slavery and human trafficking and should be read in conjunction with documents named in the associated documents section of this policy.
Although this policy is not limited to these areas, NOC has three identified key risks

- Recruitment
- Supply chain
- Working internationally & on NOC-managed Research Vessels.

2. Purpose

The purpose of this policy is to support adherence to the Modern Slavery Act 2015 and prevent slavery and human trafficking in all NOC activities including its supply chains. The policy seeks to guide and direct employees so that they are aware of the requirements placed on them, and our suppliers, contractors and business partners, including how concerns may be raised.

3. Policy

Definitions

Modern slavery takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Someone is in slavery if they are forced to work through mental or physical threat, owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse, dehumanised, treated as a commodity or bought and sold as ‘property’, physically constrained or have restrictions placed on their freedom.
The following definitions are encompassed within the term 'modern slavery' for the purposes of the Modern Slavery Act 2015. These are:

- 'slavery' is where ownership is exercised over a person
- 'servitude' involves the obligation to provide services imposed by coercion
- 'forced or compulsory labour' involves work or service extracted from any person under the threat of a penalty and for which the person has not offered themself voluntarily
- 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

The **Modern Slavery Act 2015** details the penalties for those found guilty of an offence under Section 1 or 2 of the Act and includes imprisonment for life.

Policy Statement

- NOC is committed to the implementation and promotion of ethical business practices to protect staff from being abused and exploited and expects the same high standards from its contractors, suppliers and other business partners. NOC understands its obligations under the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking

in all its activities, whether conducted by its staff or throughout its supply chain.

- We will work to ensure our internal processes and external supply chains are free from slavery and human trafficking. Where any concern is raised, we will investigate and address it.

Employment at NOC

- Workers must not be required to pay recruitment or placement fees to obtain employment. NOC prohibits practices that could lead to debt bondage and is committed to ensuring that recruitment and employment practices are transparent and fair across its operations and supply chains. When NOC works with a recruitment agency, checks are completed before hand to ensure they meet the requirements of this policy and the Modern Slavery Act 2015.

- Child labour is strictly prohibited. NOC does not employ individuals below the legal minimum working age and expects its suppliers to comply with all applicable child labour laws and regulations.

- NOC believes employees must have freedom of movement and must not be subject to unreasonable restrictions on their ability to leave the workplace.

- The confiscation or retention of employee's original identification documents, such as passports or identity cards, is strictly prohibited. Although documents will be checked and copies taken, this is so NOC can meet the legal requirement to check a person's right to work status.

Supply chain and contracting

- The supply chain refers to the entire network of entities, directly or indirectly interlinked and interdependent in serving NOC in the UK and any other country within which NOC operates.

- NOC requires that all work carried out within its operations and supply chains is freely chosen. This means workers must be free to terminate their employment at any time in accordance with applicable laws and contractual notice periods. NOC does not permit forced, bonded, or involuntary labour, including compulsory overtime, and expects suppliers to uphold the same principle and ensure workers are not prevented from leaving employment.

- NOC contracting processes include as standard specific prohibitions on the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, throughout our direct supply chain. NOC's supplier code of conduct requests that our suppliers hold their own suppliers to the same high standards.

- NOC is committed to responsible purchasing practices and will avoid engaging in commercial behaviours that increase the risk of modern slavery within its supply chain. This includes conducting due diligence and using external sources to identify risks related to a supplier. NOC will consider modern slavery risk at all stages of the procurement process, including supplier selection, contracting, and ongoing supplier management.

- We may terminate our relationship with individuals and organisations working on our behalf if they breach this Policy. Where appropriate, we will also inform the police.

- Those employees in relevant roles must advise UK suppliers, contractors and business

partners that NOC requires them to adhere to the Modern Slavery Act 2015. UK suppliers and overseas organisations that carry out business within the UK that fall within the scope of the Act, may be asked to provide evidence to this effect, such as their annual Modern Slavery Statement. When dealing with overseas suppliers and partners that do not fall within the scope of the Act, staff must advise them that they are required to act within the spirit of the Modern Slavery Act 2015 and raise awareness of modern slavery and human trafficking with their own suppliers and contractors. The precise requirements and compliance procedures will be included in contracts, terms and conditions and other relevant agreements.

- NOC is committed to promoting awareness and capability within its supply chain to prevent modern slavery.

Working internationally & on NOC-managed Research Vessels

- All operations on the NOC managed research vessels are subject to adherence with the Maritime Coastguard Authority (MCA) and the Maritime Labour Convention 2006 (MLC). This protects the rights of all those on board and ensures human rights are not violated whilst working at sea.

- In addition to the training requirements outlined by the MCA and MLC, NOC staff are provided with training designed to keep them safe whilst working abroad and support the prevention of modern slavery and trafficking crimes and associated criminal activity such as smuggling and the illegal wildlife trade.

- The marine sector is vulnerable to smuggling and the illegal wildlife trade which often have links to modern slavery crimes. NOC have in place processes specifically to reduce the likelihood of smuggling which includes security measures and import and export processes.

Operations and Risk Management

- NOC is committed to identifying and assessing modern slavery risks within its operations and supply chains as part of its broader risk management framework. In addition to routine operational risk management, total risk is considered when creating each annual modern slavery statement which is then published on the NOC website and the UK Governments register of modern slavery statements.

- The annual modern slavery statement will be written in accordance with the requirements of the Modern Slavery Act 2015 and recommendations and best practice outlined by the UK Government. This includes declaring progressive commitments to the prevention of modern slavery crimes.

- Employees have the right to freedom of association and the right to join or form worker organisations, including trade unions, in accordance with applicable laws. NOC supports the right of workers to access representation and to have a voice in matters affecting their working conditions.

- NOC seeks to ensure that all individuals working for, or on behalf of, the organisation are aware of this policy and understand their role in preventing modern slavery.

- Training on this policy, and on the risk of modern slavery forms part of the induction process for all new starters. Additionally, routine training and engagement is made available to all employees and bespoke training is available as requested to cover specific events, risks or in

response to incidents or concerns raised.

Roles and Responsibilities

The **NOC Board** is accountable for ensuring NOC complies with the relevant legal and ethical obligations.

The **Head of Legal and Governance** is responsible for:

- The Modern Slavery Policy remaining up to date and relevant to NOC.
- The production of the annual Modern Slavery Statement in compliance with the Modern Slavery Act 2015, and that it's approved and published within the correct timescales on the NOC website and UK Governments modern slavery statement register.
- Overseeing the reporting and investigation process and establishing remedial procedures to address any suspected breaches of the Modern Slavery Act 2015 or this policy.

Line managers are responsible for ensuring those reporting to them understand and comply with this Policy.

Reporting and Investigation of Concerns

The prevention, detection and reporting of modern slavery in any part of NOC business or supply chain is the responsibility of all those working for NOC or under NOC's control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All employees, if they consider there may be a risk of modern slavery anywhere within the business operations of NOC – whether directly or indirectly - are expected to raise this issue with their line manager immediately. If you do not feel comfortable doing so, you can speak to the Head of Legal and Governance and/or the Chief Operating Officer (COO). This applies whether there is a concern about a particular act, the treatment of workers more generally, or the working conditions within any part of NOC business or supply chain.

NOC aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of making a report in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. All employees must be treated with dignity and respect. NOC prohibits any form of violence, harassment, intimidation, discrimination, or inhumane treatment in the workplace. If you believe that you have suffered any such treatment, you should inform the Head of Legal and Governance or COO immediately.

Please refer to the Whistleblowing Procedure for further details of the processes NOC has in place to investigate any alleged instances of modern slavery and human trafficking.

The Head of Legal and Governance will maintain a record of all reports of modern slavery and human trafficking received and the result of any investigation. This information will be made available to the COO who will decide the appropriate course of action in each instance.

Consequences of breach of policy

Breaches of this Policy by a NOC employee will be referred for action under the NOC Disciplinary

Policy.

Any third party who breaches this policy may have their contract with NOC terminated with immediate effect.

4. Monitoring and Evaluation

This policy will be monitored and its effectiveness evaluated through internal audit and compliance activity to be undertaken by the Legal and Governance team The Board will provide oversight of this activity and one of the Trustees will sign the annual statement.

Concerns will be reported to Executive, and investigations and risk activity managed through the governance structures as appropriate to the circumstances. The policy will be reviewed as appropriate.

5. Associated Documents

- Prevention of Fraud & Anti-Bribery Policy
- Ethics Policy
- Code of Conduct
- Whistleblowing Policy
- Disciplinary Policy
- Recruitment Policy
- Grievance Policy
- Prevention of Sexual Harassment Policy
- Investigation Procedure