

Modern Slavery Policy and Procedure

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Approved By: Kendelle Bond

MODERN SLAVERY

Statement

NCBC does not tolerate modern slavery in any of its forms of slavery and servitude, forced or compulsory labour and human trafficking within our activities or our supply chain.

We continue to fully support the government's objective to eradicate modern slavery and human trafficking and we acknowledge our role in both combating it and supporting victims.

We are committed to ensuring our supply chains and business activities are free from ethical and labour standards abuse.

People

Our organisational policies provide processes and procedures to ensure that our employees and those employed in our supply chain are treated fairly at all times.

These include:

- confirming the identities of all new employees and their right to legally work in the United Kingdom and appointing staff subject to references, immigration checks and identity checks. This ensures that we can be confident, before staff begin employment, that our staff have a legal right to work within the organisation
- having a set of values and behaviours that staff are expected to comply with, with all candidates expected to demonstrate these attributes as part of the recruitment selection process
- adopting fair pay, terms and conditions of service means that we have the assurance that all staff will be treated fairly and that pay, terms and conditions will comply with the latest legislation. This includes the assurance that staff receive, at least, the London Living Wage.
- implementing employment policies and procedures designed to provide guidance and advice to staff and managers and to comply with employment legislation. These are accessible to all staff via our shared drive
- committing to creating and ensuring a non-discriminatory and respectful working environment for our staff, in line with our corporate social responsibilities
- providing a platform for our employees to raise concerns about poor working practices, through the implementation of policies covering equality, diversity and inclusion; grievance; respect and dignity at work; and whistleblowing
- requiring all staff to undertake mandatory training in relation to diversity and inclusion

Whistleblowing policy

Our Whistleblowing policy gives a platform for employees to raise concerns for further investigation and offers support to individuals that have suffered fiscal or professional detriment as a result of whistleblowing.

Equality and Diversity policy

The purpose of this policy is to ensure that we realise our ambition to create an inclusive culture and work environment, where everyone feels that they can be themselves and are valued for the difference that they bring. This furthers our commitment to having a diverse and representative workforce, alongside ensuring that our actions demonstrate a zero-tolerance approach to inappropriate behaviour and unequal treatment and where it is safe to challenge at all levels.

Code of Conduct

The Code of Conduct fulfils the dual role of protecting our interests and protecting staff from any possible accusation that they have not acted properly. All employees and all staff are provided with a copy of this document and, where necessary, can refer to the detailed provisions.

This Code makes clear the duties and obligations of all staff. It outlines the support available to protect staff from accusations of inappropriate conduct in carrying out their work. It sets the boundaries of acceptable business conduct and behaviour.