



## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR [2020- 2021]

### INTRODUCTION

This modern slavery and human trafficking statement is made on behalf of Nant Ltd pursuant to section 54(1) Modern Slavery Act 2015.

### OUR BUSINESS

Nant Ltd are a private limited company who work within the Legionella and water hygiene industry to provide compliance services throughout the United Kingdom.

Our client portfolio consists of predominantly private care homes; local authority buildings and retail and leisure facilities.

All of our plumbing and hygiene materials are sourced from UK distributors and we have longstanding relationships with our supply chain. Our Legionella filters are sourced from Belgium from a fully accredited supplier.

Service tasks include planned preventative maintenance tasks such as risk assessments and monitoring tasks as per HSG 274 part 2 guidelines. Additionally, remedial actions identified within the risk assessments and monitoring inspections are completed upon request of the client.

The business operating model consists of a risk assessment department, hygiene department and a plumbing department who specialise in the respective areas to achieve customer excellence.

### OUR SUPPLY CHAINS

The supply chains within Nant Ltd include suppliers, subcontractors and business partners of all sizes and types of supply, ranging from suppliers of services, goods and materials to suppliers.

Nant Ltd expects, and endeavours to ensure, that organisations within its supply chains also have no tolerance to any form of modern slavery and human trafficking and the Company adopt responsible business practices in respect of reducing the risk of modern slavery and human trafficking.

Supplier reviews are carried out all key suppliers annually.

### OUR POLICIES AND CONTROLS

Our Modern Slavery and Human Trafficking Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.



We strive to ensure that employment is chosen freely; freedom of association is respected; working conditions are safe and hygienic; child labour is not used; wages are not lower than minimum wage; working hours are not excessive; no discrimination is practised; regular employment is provided; and no harsh or inhumane treatment is allowed.

We endeavour to carry out appropriate checks to ensure that any new applicant is suitable for the role that they have applied for. Prior to making an offer, it is our usual practice to ensure that all applicants are aware of what checks we will carry out. We make job offers subject to appropriate satisfactory vetting procedures (where required). All our people undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checking and, where applicable, DBS checks. We employ most of our people directly or on a fixed-term basis with checks in place to ensure that payment of salary is made direct to that person. In addition to striving to ensure compliance with legislative requirements, we carry out additional background checks on a risk basis, either through our own assessment or one carried out in conjunction with our client.

Our Recruitment Procedure outlines the mandatory requirements we impose, which includes the requirement to use approved agencies in the recruitment process. Our On-Boarding Procedure seeks to ensure that third party providers can demonstrate that they comply with all legal requirements, including the requirement to comply with the Modern Slavery Act 2015.

## **DUE DILIGENCE PROCESSES**

We enforce our policies and procedures in an effort to ensure that slavery and human trafficking is not taking place anywhere in our business or supply chain. Our supplier on-boarding process includes standard due diligence procedures, which help us assess the suitability of a vendor to provide goods and services to Nant Ltd against compliance to required standards. This process captures confirmation that they are committed to ensuring that slavery and human trafficking is not taking place within their own supply chain.

Failure by a supplier to agree to adhere to legal requirements, to respond to any audit questionnaire or to provide assurances that it has satisfactorily assessed its own risk of modern slavery, may lead us to review our business relationship.

## **RISK MANAGEMENT AND ASSESSMENT OF EFFECTIVENESS**

This policy is reviewed at least annually and updated by the board of directors to ensure adherence as per section 54(1) Modern Slavery Act 2015. Policies and procedures are audited internally as per the quality departments internal audit schedule as part of our ISO9001:2015 quality management system. External audits of the system are assessed by Alcumus Isoqar and our latest accreditation commenced on 4<sup>th</sup> November 2016 and is audited annually against ISO9001:2015 standards.



## TRAINING

Nant Ltd offer training to all of our employees in regards to slavery and human trafficking and training in how to implement the business' policies and procedures. These are available through our professional networks which include the Black Country Chamber of Commerce Platinum Membership and our HR consultancy representatives Peninsula.

## APPROVAL

This modern slavery and human trafficking statement was approved by the Board of Directors of on Nant Ltd 3<sup>rd</sup> November 2020.

Christopher Green

A handwritten signature in black ink, appearing to read "C Green", is enclosed within a thin black rectangular border.

**Chairman of the Board of Directors**

03.11.2020