

ANTI- SLAVERY, HUMAN TRAFFICKING, FORCED AND BONDED LABOUR POLICY

1. WHY IT MATTERS

Bidvest Noonan is an ethical and equal opportunities employer, committed to operating in accordance with current best practice and limiting any potential for labour rights violations within its operations. As an 'Investors In People' accredited organisation, Bidvest Noonan facilitates continuous improvement within its Human Resources department. Bidvest Noonan are also committed to all policies contained with the Base Code of the Ethical Trading Initiative.

As a provider of strategic outsourcing solutions, people are Bidvest Noonan's key asset. With many of Bidvest Noonan's employees operating in the cleaning and security sectors, the company acknowledges a medium-level risk to its operational staff in terms of labour and rights violations; as such, Bidvest Noonan takes all possible steps to mitigate these risks and ensure compliance to all legislative acts and guidelines.

2. PURPOSE

Bidvest Noonan is committed to ensuring there is transparency in the business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners.

3. KEY PRINCIPLES

All employees are responsible for reading, understanding and complying with this policy. Bidvest Noonan managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy and complete any certification or training required of them.

4. COMPLIANCE

The legislative guidelines incorporated into all aspects of Bidvest Noonan's activities are as follows:

Ireland

- The Employment Equality Acts 1998-2015 aim to: promote equality, ban discrimination across nine grounds, ban sexual and other harassment, ban victimisation, make sure suitable facilities for people with disabilities are available in relation to access to employment, advancing in employment and taking part in training, allow positive action to ensure everyone gets full equality across the nine grounds.
- Safety, Health and Welfare Law in Ireland, section 8 of the SHWW Act 2005 (Bullying in the workplace)

Northern Ireland

Bidvest Noonan operates in line with British Standard BS7858.

- The Race Relation (NI) Order 1997
- The Sex Discrimination (NI) order 1988 and the Equal Pay Northern Ireland 1970
- The Disability Discrimination (NI) Order 2006
- The Fair Employment and Treatment Order (Amendment) regulations NI 2003
- The Employment and Equality (Age) Regulations (NI) 2006
- The Employment Equality (Sexual Orientations) Regulations (NI) 2003

United Kingdom

- Equality Act 2010
- Modern Slavery Act 2015

Procurement

Bidvest Noonan takes steps to ensure that its supply chain is held up to the same high standards as Bidvest Noonan itself. In the first instance, this means only working with subcontractors who can prove their own rigorous recruitment procedures and commitment to laws and legislative guidelines.

Bidvest Noonan's Procurement department is further committed to mitigating any risk of labour rights violations within the supply chain.

Effective procurement procedures are key to Bidvest Noonan success in mitigating the risk of modern slavery and bonded labour within its supply chain.

Recruitment

Internal training courses and employee tool box talks have been designed in order to fully equip managers, supervisors, team leaders and HR professionals with the necessary skills to spot the signs of modern slavery.

Bidvest Noonan implements the following key processes at the recruitment stage:

Interviews must be conducted and questionnaires completed to ensure potential suppliers carry out the following recruitment techniques:

- All applicants have been interviewed to ensure that they have filled all registration forms themselves
- Applicants can only be interviewed at an approved location
- Unauthorised agents or individuals will not be allowed to introduce job applicants
- Supervisors and Team Leaders must bring any suspicion of illegal activity regarding agents to management and subsequently the police

Spotting the Signs of Modern Slavery during Employment

Supplier staff are also monitored on an ongoing basis after employment. Supervisors are trained to spot the signs of modern slavery, with particular attention paid to a number of factors:

- Physical appearance of their employees – in terms of potential of abuse or malnutrition
- Employees' personal effects, documentation and freedom of movement
- Whether employees are regularly dropped off / collected by a third party
- The influence of third parties on staff.

Child Labour

In addition to our compliance with Human Rights regulations, Bidvest Noonan adheres with the Child Labour Law in accordance with the Protection of Young Persons (Employment) Act 1996. The Act is designed to protect the health of young workers and to ensure that work during the school years does not put a young person’s education at risk. The law sets minimum age limits for employment, sets rest intervals and maximum working hours, and prohibits the employment of under 18s on late night work. Bidvest Noonan have specified records for their workers who are under 18.

The Dignity at Work Policy

A policy setting out the expected standards and the channels for redress, The Dignity at Work Policy, is in place Group wide. This policy exists as a reference guideline and facilitates any employee or perspective employee who believes that he or she has been treated unfairly, within the scope of this policy, to raise the matter through the Company Harassment Procedure.

Continuous Improvement

Bidvest Noonan will keep under review its Equal Opportunities, Diversity, Human Rights and Child Labour practices to account for changing circumstances across all jurisdictions. This includes appropriate application of both Positive Action and Affirmative Action measures as advised by statutory bodies.

5. BREACHES

Breaches of this Policy must be reported. In the first instance contact your line manager and follow the Incident Reporting & Management Procedure.

Where this is not possible, contact the Compliance Department or CORE (confidential) to report your concerns.

<i>Bidvest Noonan Compliance & Legal Department</i>	EMAIL (IOI) complianceioi@bidvestnoonan.com EMAIL (GB) compliancegb@bidvestnoonan.com core@bidvestnoonan.com	IOI - Unit 3, Swords Business Park, Sword Co Dublin GB - 3 Lower Thames Street, London. EC3R 6HD
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6. CONTACT

If you have any questions on how this Policy or related guidance applies or should be implemented, or if you have any other competition law related query (including if you receive any contact from regulators), please contact:

Compliance Department
 E: complianceioi@bidvestnoonan.com
compliancegb@bidvestnoonan.com