Document Group ID: 99bde003e5554c348a4b36f9c17b73c777fc9ea2

November 2026

NF-POL-29

Modern Day Slavery Policy

Table Of Contents

1. PURPOSE 3

2. POLICY STATEMENT 3

3. SCOPE 4

4. RESPONSIBILITIES 5

5. RISK AREAS & IDENTIFICATION 5

6. DUE DILIGENCE & SUPPLIER CONTROLS 7

7. TRAINING & AWARENESS 8

8. REPORTING CONCERNS 9

9. BREACHES OF THIS POLICY 10

10. REVIEW & APPROVAL 11

11. APPROVALS 12

12. REFERENCE TO RELATED DOCUMENT 12

13. CHANGE RECORD 12

1. PURPOSE

The purpose of this Modern Slavery Policy is to define Nano Fibre UK's commitment to preventing, identifying, and addressing all forms of modern slavery and human trafficking within its operations and supply chain.

Nano Fibre UK recognises that modern slavery is a serious violation of human rights and is committed to operating with integrity, transparency, and ethical responsibility in all business activities.

This policy establishes Nano Fibre UK's approach to:

- Preventing modern slavery and human trafficking
- Identifying and managing risks within operations and supply chains
- Ensuring ethical business practices across all relationships
- Promoting awareness and accountability across the organisation
- Providing clear mechanisms for reporting concerns

Nano Fibre UK will ensure that:

- A zero-tolerance approach to modern slavery is maintained
- Effective systems and controls are in place to prevent exploitation
- Risks are identified and managed through due diligence and monitoring
- All individuals understand their responsibilities in preventing modern slavery

This policy supports Nano Fibre UK's commitment to:

- Ethical business conduct
- Legal compliance, including obligations under the Modern Slavery Act 2015
- Responsible supply chain management
- Continual improvement within the Integrated Management System (IMS)

2. POLICY STATEMENT

Nano Fibre UK is committed to ensuring that modern slavery, servitude, forced or compulsory labour, and human trafficking have no place within its operations or supply chain.

The organisation operates a zero-tolerance approach to modern slavery and is committed to acting ethically, with integrity, and in full compliance with applicable legal and regulatory requirements.

Nano Fibre UK will ensure that:

- All business activities are conducted in a manner that upholds human rights and ethical standards
- Effective systems and controls are in place to prevent modern slavery within operations and supply chains
- Risks are identified, assessed, and managed through due diligence and monitoring
- Suppliers, contractors, and partners are expected to meet the same ethical standards
- Any concerns or suspected breaches are taken seriously and addressed promptly
-

All employees, contractors, suppliers, and individuals acting on behalf of Nano Fibre UK must:

- Comply with this policy and all applicable legal requirements
- Not engage in, support, or tolerate any form of modern slavery
- Act with integrity and transparency in all business dealings
- Report any concerns or suspicions of modern slavery without delay

Nano Fibre UK will not tolerate:

- Any form of forced, bonded, or involuntary labour
- Human trafficking or exploitation of individuals
- Any activity that restricts an individual's freedom or violates their rights
- Failure to report or act on known or suspected breaches

Any breach of this policy may result in:

- Disciplinary action, up to and including dismissal
- Termination of contracts with suppliers, contractors, or partners
- Referral to relevant authorities where required

Nano Fibre UK is committed to maintaining a culture where ethical behaviour is expected, supported, and enforced at all levels of the organisation.

3. SCOPE

This policy applies to all individuals and organisations working for or on behalf of Nano Fibre UK, regardless of role, location, or contractual arrangement.

This includes:

- Employees (permanent, temporary, and fixed-term)
- Agency workers and temporary labour
- Contractors, subcontractors, and consultants
- Suppliers and service providers
- Business partners and any third parties acting on behalf of Nano Fibre UK

This policy applies to all business activities and operations, including:

- Internal operations and office-based activities
- Field-based operations, including fibre installation, water meter installation and associated civil engineering and construction works.
- Procurement and supply chain activities
- Logistics and transportation
- Any work undertaken on behalf of clients

This policy applies across:

- All locations within the United Kingdom
- Any international operations or supply chain relationships

3.1. Supply Chain Application

Nano Fibre UK recognises that modern slavery risks may exist within supply chains and will ensure that:

- Suppliers and subcontractors are expected to comply with this policy
- Ethical standards are communicated and enforced throughout the supply chain
- Appropriate due diligence is carried out when engaging third parties

3.2. Application to Work Activities

This policy applies regardless of:

- The nature of the work being undertaken
- The contractual arrangement in place
- Whether work is carried out directly or indirectly on behalf of Nano Fibre UK

All individuals and organisations within scope must comply with this policy where there is a connection to Nano Fibre UK's operations or services.

4. RESPONSIBILITIES

Role	Responsibilities
Board of Directors / Senior Management	• Take overall responsibility for ensuring compliance with this policy and applicable legislation. • Demonstrate leadership and commitment to ethical business practices. • Ensure adequate resources are in place to manage modern slavery risks. • Review risks, performance, and effectiveness of controls through Management Review.
ISO / Compliance Team	• Maintain this policy within the Integrated Management System (IMS). • Support identification and assessment of modern slavery risks. • Monitor compliance and support audits where required. • Link findings to corrective and improvement actions (CIA Register).
Procurement / Supply Chain Management	• Conduct due diligence on suppliers and subcontractors. • Ensure appropriate contractual clauses are in place relating to modern slavery. • Assess and monitor supplier compliance and risk. • Escalate concerns relating to supplier behaviour or practices.
Line Managers / Supervisors	• Ensure employees are aware of and understand this policy. • Monitor working practices within their teams. • Identify and escalate any concerns or risks. • Support reporting and investigation processes.
Employees and Contractors	• Comply with this policy and act ethically at all times. • Avoid any activity that could lead to or suggest a breach of this policy. • Remain vigilant to potential signs of modern slavery. • Report any concerns or suspicions immediately.

5. RISK AREAS & IDENTIFICATION

Nano Fibre UK recognises that the risk of modern slavery may exist within certain areas of its operations and supply chain.

The organisation will take a risk-based approach to identifying, assessing, and managing these risks to ensure appropriate controls are in place.

5.1. Operational Risk Areas

As a company delivering fibre installation, water meter installation and associated civil engineering services across the UK, Nano Fibre UK recognises that higher-risk areas may include:

- Use of temporary, agency, or subcontracted labour
- Field-based operations, including installation and construction activities
- Logistics, transportation, and site-based work environments

These environments may present increased risk due to:

- Limited direct supervision
- Use of third-party labour
- Variability in working conditions

5.2. Supply Chain Risk

Nano Fibre UK acknowledges that modern slavery risks may exist within its supply chain, particularly where:

- Materials or equipment are sourced from international suppliers
- There is limited visibility of supplier labour practices
- Multiple tiers of subcontracting are involved

The organisation will take steps to improve transparency and reduce exposure to these risks.

5.3. Labour and Workforce Risk

Risks may arise where:

- Workers are recruited through third parties or agencies
- Individuals may be vulnerable due to personal, economic, or social factors
- There is potential for exploitation through working conditions or arrangements

Nano Fibre UK will ensure that fair and lawful working practices are maintained at all times.

5.4. Identification of Risk Indicators

All individuals must remain vigilant to potential indicators of modern slavery, which may include:

- Individuals appearing fearful, withdrawn, or under control of others
- Lack of personal identification or documentation
- Poor working or living conditions
- Unusual working hours or restrictions on movement
- Signs of coercion, intimidation, or exploitation

Any such indicators must be reported immediately.

5.5. Risk Assessment and Review

Nano Fibre UK will ensure that:

- Modern slavery risks are considered as part of risk assessment processes
- High-risk areas are subject to increased scrutiny and monitoring

- Risk assessments are reviewed periodically and updated where required

Risk identification supports the implementation of effective controls and continual improvement.

6. DUE DILIGENCE & SUPPLIER CONTROLS

Nano Fibre UK is committed to ensuring transparency, accountability, and ethical practices throughout its supply chain.

The organisation will implement due diligence and control measures to identify, assess, and mitigate the risk of modern slavery within supplier and subcontractor relationships.

6.1. Supplier Due Diligence

Nano Fibre UK will ensure that appropriate due diligence is carried out when engaging new suppliers, subcontractors, and business partners.

This may include:

- Assessing supplier risk based on location, industry, and service type
- Reviewing supplier policies and procedures relating to modern slavery
- Requesting evidence of compliance with legal and ethical standards
- Evaluating previous performance or known risks

Higher-risk suppliers may be subject to enhanced due diligence.

6.2. Contractual Controls

Nano Fibre UK will ensure that:

- Supplier and subcontractor agreements include clauses requiring compliance with modern slavery legislation
- Suppliers are required to adhere to ethical standards consistent with this policy
- Non-compliance with modern slavery requirements may result in termination of contractual relationships

Contractual controls provide a clear expectation of behaviour and accountability.

6.3. Monitoring and Assurance

Nano Fibre UK may implement ongoing monitoring of suppliers and subcontractors, which may include:

- Periodic reviews of supplier performance
- Requests for updated documentation or evidence of compliance
- Supplier audits or site visits where appropriate
- Assessment of compliance during contract delivery

Monitoring will be proportionate to the level of risk identified.

6.4. Supply Chain Transparency

Nano Fibre UK will take steps to improve visibility across its supply chain by:

- Maintaining records of suppliers and subcontractors
- Identifying high-risk areas or relationships
- Encouraging open communication with suppliers regarding ethical practices

The organisation recognises that supply chain transparency is key to preventing modern slavery.

6.5. Escalation and Action

Where concerns are identified in relation to suppliers or subcontractors, Nano Fibre UK will ensure that:

- Concerns are assessed and investigated appropriately
- Corrective actions are requested where necessary
- Relationships are reviewed and, where required, terminated

Appropriate action will be taken to mitigate risk and prevent further exposure.

7. TRAINING & AWARENESS

Nano Fibre UK will ensure that all individuals are provided with the information, instruction, and awareness necessary to understand modern slavery risks and comply with this policy.

The organisation recognises that awareness and vigilance are critical in identifying and preventing modern slavery within both operations and the supply chain.

7.1. Training Requirements

Nano Fibre UK will ensure that:

- All employees receive awareness training on modern slavery risks and responsibilities
- Training is proportionate to role and level of risk exposure
- Additional training is provided to individuals working in higher-risk areas

This may include:

- Procurement and supply chain teams
- Operational and field-based staff
- Managers and supervisors responsible for oversight

7.2. Induction and Onboarding

All new employees will receive information relating to this policy as part of their induction.

This will include:

- Understanding what modern slavery is
- Recognising potential indicators of exploitation
- Knowing how to report concerns
- Awareness of individual responsibilities

7.3. Ongoing Awareness and Communication

Nano Fibre UK will promote ongoing awareness through:

- Policy communications and updates
- Briefings, toolbox talks, or targeted awareness sessions
- Sharing lessons learned or emerging risks

Awareness activities will support a culture of vigilance and ethical responsibility.

7.4. Competence and Role-Based Awareness

Nano Fibre UK will ensure that:

- Individuals in higher-risk roles have a deeper understanding of modern slavery risks
- Managers and supervisors are equipped to identify and escalate concerns
- Procurement teams understand supplier risk and due diligence requirements

7.5. Record Keeping

Where appropriate, Nano Fibre UK will ensure that:

- Training and awareness activities are recorded
- Competence is reviewed periodically
- Additional training is provided where gaps are identified

8. REPORTING CONCERNS

Nano Fibre UK is committed to ensuring that all individuals are able to raise concerns about suspected modern slavery or human trafficking safely, confidently, and without fear of retaliation.

All concerns will be taken seriously and handled appropriately.

8.1. Reporting Responsibilities

All employees, contractors, and individuals working on behalf of Nano Fibre UK must:

- Remain vigilant to potential signs of modern slavery
- Report any concerns or suspicions immediately
- Not ignore or dismiss potential indicators of exploitation

Failure to report known or suspected concerns may be treated as a breach of Company expectations.

8.2. Reporting Channels

Concerns may be reported through the following channels:

- Line Manager or Supervisor
- Senior Management
- Human Resources (HR) Department
- Whistleblowing procedures (where applicable)

Nano Fibre UK will ensure that reporting routes are accessible, clear, and communicated.

8.3. Anonymous Reporting

Individuals may raise concerns anonymously where they feel unable to report openly.

Nano Fibre UK will ensure that:

- Anonymous reports are considered and assessed appropriately
- Individuals are not disadvantaged for raising concerns

It is recognised that anonymity may limit the ability to investigate fully.

8.4. Confidentiality and Protection

Nano Fibre UK will ensure that:

- All concerns are handled with appropriate confidentiality
- Information is shared only where necessary
- Individuals raising concerns are protected from victimisation or retaliation

Any form of retaliation against an individual raising a concern will not be tolerated and may result in disciplinary action.

8.5. Handling of Reports

Nano Fibre UK will ensure that:

- Reports are assessed and investigated proportionately
- Appropriate action is taken based on findings
- Outcomes are managed in line with Company procedures

Where appropriate, concerns may be escalated to external authorities.

8.6. External Reporting

Where there is a risk of serious harm or criminal activity, concerns may be reported to:

- Law enforcement agencies
- Relevant regulatory or safeguarding bodies

Nano Fibre UK reserves the right to refer matters externally where necessary.

9. BREACHES OF THIS POLICY

Nano Fibre UK operates a zero-tolerance approach to modern slavery and any breach of this policy will be treated seriously.

All individuals and organisations within scope are expected to comply fully with the requirements set out in this policy.

9.1. Employee Breaches

Any employee found to be in breach of this policy may be subject to:

- Formal investigation
- Disciplinary action in line with Company procedures
- Outcomes up to and including dismissal

Examples of breaches may include:

- Involvement in or facilitation of modern slavery or exploitation

Document Group ID: 99bde003e5554c348a4b36f9c17b73c777fc9ea2

- Failure to report known or suspected incidents
- Deliberate disregard for policy requirements or controls

9.2. Contractor and Supplier Breaches

Where contractors, subcontractors, or suppliers are found to be in breach of this policy, Nano Fibre UK may take action including:

- Requiring immediate corrective action
- Suspension of work or services
- Termination of contracts or business relationships

Nano Fibre UK will not continue to engage with organisations that fail to meet acceptable ethical standards.

9.3. Investigation and Action

Nano Fibre UK will ensure that:

- All suspected breaches are assessed and investigated appropriately
- Actions taken are proportionate to the nature and severity of the breach
- Relevant stakeholders are informed where required

Where appropriate, matters may be escalated to external authorities.

9.4. Failure to Comply

Failure to comply with this policy, including failure to follow reporting requirements or due diligence processes, may result in:

- Disciplinary action
- Removal of responsibilities or authorisation
- Further corrective or preventive measures

10. REVIEW & APPROVAL

This Modern Slavery Policy will be reviewed at least annually, or sooner where required, to ensure it remains effective, relevant, and aligned with Nano Fibre UK's legal obligations and operational activities.

A review may be triggered by, but is not limited to:

- Changes in legislation or regulatory requirements, including updates to the Modern Slavery Act 2015
- Updates to industry best practice or guidance
- Identified risks within operations or the supply chain
- Internal audit findings, nonconformances, or investigations
- Changes to business activities, suppliers, or operational structure
- Outcomes from Management Review

Nano Fibre UK will ensure that:

- This policy is maintained as part of the Integrated Management System (IMS)
- Any updates are reviewed, approved, and communicated appropriately

- Superseded versions are controlled in accordance with Document Control procedures

This policy forms part of Nano Fibre UK's commitment to ethical business practices, legal compliance, and continual improvement, ensuring that modern slavery risks are effectively managed and reduced over time.

11. APPROVALS

Name and Surname:	Designation:	Role in Document	Signature:	Date:
Callum Krzysik	Head of ISO Compliance	Approver		20/11/2026
Ashley Woodcock	Process Manager	Approver		25/11/2026
Lisa Woods	Head of HR	Policy Owner		19/11/2026
Wilhelm Strumpher	CEO	Approver		18/11/2026
Dirk Mostert	COO	Approver		18/11/2026

12. REFERENCE TO RELATED DOCUMENT

ID	Title of Document
NF-POL-025	Whistleblowing Policy
NF-POL-040	Code of Conduct
	Supplier Approval & Management Procedure
NF-POL-061	Disciplinary Policy
NF-POL-026	Grievance Policy
NF-POL-028	Data Protection and GDPR Policy
NF-POL-047	Procurement Policy
NF-POL-001	Health & Safety Policy
NF-POL-033	Equality, Diversity & Inclusion Policy

13. CHANGE RECORD

Date	Information
29-04-2026	Template changed from new to old template
16-10-2026	Business activity descriptions updated to include water meter installation and associated civil engineering services. No changes made to the policy's commitments or controls.
20-10-2026	Added **Information Classification: INTERNAL** to the document footer.
06-11-2026	Changed the document classification in the footer from INTERNAL to PUBLIC.