

# NUCOLOUR LTD

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## MODERN SLAVERY POLICY

### 1. Policy Statement

NuColour Ltd is committed to preventing modern slavery, human trafficking, forced labour, and exploitation in all aspects of our business operations and supply chains. We recognise our responsibility to uphold ethical business practices and to ensure that all work undertaken by or on behalf of our company is free from modern slavery and human rights abuses.

This policy applies to all employees, subcontractors, suppliers, and business partners involved in the operations of NuColour Ltd. We expect all stakeholders to comply with this policy and adhere to the highest standards of fair employment practices, human rights, and ethical sourcing.

### 2. Legal Compliance

NuColour Ltd is committed to ensuring compliance with:

The Modern Slavery Act 2015

The Human Rights Act 1998

The Employment Rights Act 1996

The Equality Act 2010

The ILO (International Labour Organization) Conventions on Forced Labour

We actively work to identify, prevent, and address any risks of modern slavery within our business operations and supply chains.

### 3. Our Commitments

To combat modern slavery, NuColour Ltd ensures:

#### 3.1. Ethical Recruitment & Employment Practices

All employees and subcontractors work voluntarily, with fair wages and legal employment rights.

We do not tolerate forced, bonded, or child labour under any circumstances.

Employees have the right to leave their employment freely, in line with legal notice periods.

We comply with minimum wage legislation and fair working hours in accordance with UK employment law.

#### 3.2. Supplier & Subcontractor Due Diligence

All suppliers and subcontractors must adhere to ethical labour practices.

We conduct risk assessments and audits to ensure compliance with modern slavery laws.

Contracts include explicit anti-slavery clauses, ensuring that no forced or trafficked labour is used within our supply chain.

#### 3.3. Employee Awareness & Training

We provide modern slavery awareness training to employees and managers.

Staff are encouraged to report any concerns or suspicions about unethical labour practices.

### 3.4. Whistleblowing & Reporting

We operate a strict whistleblowing policy allowing employees, suppliers, or third parties to report suspicions of modern slavery anonymously.

Any concerns raised will be investigated promptly, and corrective actions will be taken.

## 4. Identifying & Managing Modern Slavery Risks

NuColour Ltd recognises that modern slavery risks can exist in:

Labour Exploitation – Ensuring subcontractors, agency workers, and employees are treated fairly.

Supply Chains – Monitoring materials, suppliers, and procurement processes for unethical practices.

Outsourced Services – Auditing cleaning, logistics, and manufacturing services for ethical compliance.

We regularly review and assess these risks and implement measures to strengthen transparency and accountability.

## 5. Responsibilities

### 5.1. Management Responsibilities

Conduct due diligence on suppliers and subcontractors.

Provide training to employees and procurement teams on modern slavery risks.

Investigate any reported incidents of modern slavery and take corrective actions.

### 5.2. Employee Responsibilities

Report any concerns or suspicions related to modern slavery.

Follow ethical working practices and comply with company policies.

Ensure no participation in forced, coerced, or exploitative labour practices.

## 6. Reporting & Investigations

NuColour Ltd encourages employees, suppliers, and stakeholders to report any suspected cases of modern slavery or human trafficking. Reports can be made:

Via Email: [hr@nucolour.co.uk](mailto:hr@nucolour.co.uk)

By Phone: 03301 333 420

In Person: 86-90 Paul St, London, EC2A 4NE

We guarantee confidentiality and protection for whistleblowers under our Whistleblowing Policy.

## 7. Monitoring & Review

This policy is reviewed annually or whenever necessary to reflect changes in legislation, industry best practices, or company operations.

**Last Reviewed: 05.01.2026**

**Next Review Date: 05.01.2027**