

# **Nexus Infrastructure plc**

## **Policy**

### **Modern Slavery Statement**

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Approved By : Nexus Infrastructure plc Board  
Next Review Date :February 2020

## Modern Slavery Statement

### Introduction

This statement is made in pursuant of section 54 of the Modern Slavery Act 2015 (the 'Act') and constitutes Nexus Infrastructure plc's modern slavery statement for the financial year ending 30 September 2019.

The Act requires businesses to state the steps they have taken during the financial year to ensure modern slavery is not taking place in their operations or supply chains. Modern slavery incorporates offences of slavery, servitude and forced or compulsory labour and human trafficking. The statement outlines Nexus' approach to tackling modern slavery.

### The Business

Nexus Infrastructure plc (including its subsidiaries) referred to in this statement as "Nexus" is a leading provider of essential infrastructure services to the UK housebuilding and commercial sectors, operating nationally throughout the UK. Nexus does not operate outside of the UK.

Nexus directly employs in the region of 850 staff, all of which are based in the UK.

Nexus recognises that it has a responsibility to take a robust approach to modern slavery and is committed to preventing modern slavery in all its activities and within its supply chain.

### Supply Chain and Due Diligence

The Nexus supply chain includes sub-contractors, employment agencies and suppliers of goods and materials. Nexus has a zero-tolerance approach to modern slavery and requires its supply chain to comply with this commitment.

- **Sub-contractors** – Nexus undertakes due diligence on all new sub-contractors, each is required to complete a pre-qualification questionnaire before becoming an approved sub-contractor. Modern Slavery forms part of the pre-qualification questionnaire and sub-contractors are required to confirm they conduct business within all applicable laws and regulations, including the Modern Slavery Act.

- **Suppliers of Goods and Materials** – Each Nexus subsidiary has a procurement department that operates a database of approved goods and material suppliers. As part of due diligence, Nexus requires new suppliers to complete a Material Supplier Audit and confirm they conduct business within all applicable laws and regulations, including the Modern Slavery Act.
- **Employment Agencies** – Nexus undertakes due diligence when considering taking on new suppliers of labour and maintains a preferred supplier list of employment agencies who must comply with the Nexus Right to Work Policy (prevention of illegal working) and are subject to regular audit. Agency labour providers must be Gangmaster Licencing Authority (GLA) registered and follow the provisions of the Gangmaster Licencing Act 2004.

## Policies

Nexus has a number of policies which aim to minimise the risk of modern slavery. These include:

- **Right to Work Policy (prevention of illegal working)** which sets out the requirement to conduct right to work checks for all employees to safeguard against modern slavery.
- **Anti-Bribery and Corruption Policy** which confirms that Nexus does not tolerate any form of bribery, whether direct or indirect. The board and senior management are committed to preventing bribery, in accordance with the Bribery Act 2010.
- **Whistle-blowing Policy** which provides staff with guidance as to how to raise any concerns and reassurance they can raise concerns in good faith without fear of reprisals.
- **Equal Opportunities Policy** Nexus is committed to ensuring that all staff are treated fairly and are provided with a working environment, which promotes dignity and respect to all.
- **Corporate Social Responsibility Policy** Nexus actively looks for opportunities to improve the environment and to contribute to the wellbeing of its people and the communities in which it trades.

## Training and Communication

This statement is made available to all employees via the Company intranet site and Document Management System. Training on modern slavery and the risk of modern slavery in our supply chains forms part of the induction process for new employees.

In this financial year, Nexus will continue to develop and deliver training to all relevant employees on Modern Slavery and the training will include updated information from relevant external agencies such as GLA.

## Measuring Effectiveness

The senior management team shall take responsibility for implementing this policy statement and shall provide adequate resources and investment to ensure that modern slavery is not taking place within Nexus or its supply chain.

To date, there have been no reported incidents by law enforcement agencies, employees or members of the public to indicate any modern slavery practices in our operations or supply chain.

This financial year, Nexus is committed to:

- Develop and report on key performance indicators including training and audit activities;
- Undertaking a full review of its due diligence processes to ensure that it reflects the new legislation;
- Gaining knowledge and understanding of the Government approaches and other companies' approaches to minimise the risk of modern slavery practices within Nexus or its supply chain.

## Approval

This statement has been approved by the organisation's Board of Directors who will review and update it annually.