

ANTI- SLAVERY POLICY

This policy ensures that Natta Building Company Ltd complies with section 54 of the Modern Slavery Act 2015 and sets out the responsibilities for employers and employees.

Natta Building Company is committed to ensuring that all its business operations are free from involvement with slavery or human trafficking.

Annual Statement

Natta Building Company will publish an annual slavery and human trafficking statement. A link to this statement will be on the homepage of the website and will be signed and approved by John E. Whelan, Managing Director.

John E. Whelan is responsible for ensuring that this statement is published and reviewed on an annual basis.

The statement will explain the steps that Natta Building Company has taken to ensure that slavery and trafficking are not taking place in any of its supply chains, or in any part of its own business.

Content of the Statement

The following items will be included in the statement.

1. The structure of our organisation, the business operations of the organisation and the supply chains.
2. Our policies in relation to slavery and human trafficking.
3. The due diligence processes that we carry out to ensure that there is no slavery or human trafficking in our business and supply chains.
4. Identification of any parts of our business and supply chains where there is a risk of slavery or human trafficking take place, and the steps that we have taken to assess and manage the risk.
5. An assessment of the effectiveness of the measures that we have taken to stop slavery and human trafficking taking place, and the way that we assess and manage the risks that are identified.
6. A statement that training about slavery and human trafficking is available to all employees.

Additional Action Points

In addition to producing the annual statement, Natta Building Company is committed to:

- ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility
- ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure
- carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK

- ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act
- appointing the Senior Management Team to oversee the compliance with the Modern Slavery Act 2015
- identifying and addressing any areas of high risk in our supply chain
- Providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Natta as a principal contractor specialise in civil engineering projects comprising section 278 and 38 infrastructure roads, sewers and services, together with high quality external works packages. We also undertake design and build building packages with experience in various build styles including steel frames, reinforced concrete frames, basements and traditional brick/block work. Bespoke projects, such as waste recycling centres, data centres and new utility infrastructure complete our wide-ranging portfolio of works

This statement is made in conformance with Section 54, of the Modern Slavery Act 2015 and sets out the steps Natta Building Company has taken to ensure that slavery and human trafficking is not taking place in its business or any part of its supply chain. Natta's code of conduct prohibits modern slavery.

Our products are used in construction and civil engineering, in total we have over 500 workers and employees nationally. We rely on construction industry partners and suppliers nationally to help design, develop and construct our product portfolio and support our operations and network. We work with over 1,000 suppliers mainly in the UK and occasionally overseas.

We are committed to driving out acts of modern slavery and human trafficking within its business and within its supply chains, including sub-contractors and partners. All Natta employees have a responsibility to comply with this policy be alert to the risks brought about by modern slavery in our business and the wider supply chain. Staff are expected to report any concerns and management are expected to act upon them.

Suppliers (including their own subsidiaries or sub-contractors) are expected to act in accordance with Natta's core principles.

Natta Building Company has a zero tolerance on forced labour, involuntary labour, child labour and human trafficking. We will ensure compliance through management meetings, site visits, internal and external audits. Natta Building Company has put in place fair and transparent recruitment and resourcing procedures in relation to labour practices, false employment and modern slavery in accordance with relevant legislation and standards. Natta expects all suppliers to conduct right to work checks of their work-force in accordance with the Immigration, Asylum and Nationality Act 2006, which will be reinforced when a worker attends their first site induction and where their papers will be verified.

Natta Building Company will seek to work in partnership with all suppliers to combat the threat of human trafficking and modern day slavery across the construction industry and throughout our supply chain, in accordance with the international environmental, social and ethical standards.

The management of human rights risk and impact in our business operations is embedded into existing management systems and process. Our Senior Management Team is responsible for ensuring compliance with local laws and regulations. Our teams work with the business leaders to ensure compliance with this policy. All employees receive regular communications and we support regular training on human rights related concerns.



John E Whelan | Managing Director