

## Slavery & Human Trafficking Statement 2023

This statement sets out Northwood Hygiene Products Ltd (NHP) actions to understand all potential Modern Slavery risks related to all its' business and to put in place steps to ensure there is no slavery or human trafficking in its own business and supply chains.

### Organisational Structure and Supply Chains

This statement covers the activities of NHP, in the manufacturing, supply and transportation of away from home professional paper hygiene products. It further covers the NHP supply chain involves our own transportation of manufactured products to Distributors and Customers across the UK and Europe.

### Policy

NHP operates the following policies that describe its' approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its own operations:-

**Guiding Principles & Code of Conduct** – the NHP has a set of Guiding Principles which makes clear to relevant colleagues the actions and behaviour expected of them when working and representing the organisation. NHP strives to maintain the highest standards of conduct and ethical behaviour. NHP also clearly defines policies and accountability relating to Modern Day Slavery including Child Labour, Forced Labour and Freedom of Association.

**Protected Disclosure & Whistleblowing Policy** – NHP encourages all of its colleagues to report any wrongdoing at work or criminal acts. The policy is designed to make it easy for colleagues to make disclosures, without fear of retaliation. Colleagues are encouraged to report concerns with their line manager, the CEO or via third party independent whistleblowing channels. NHP expects all suppliers to have in place their own effective system for reporting.

**Real Living Wage** – NHP believes in the wellbeing and prosperity of our colleagues and third-party contractors employed to provide services. We are committed to paying a minimum of the Living Wage rate for all colleagues (including apprentices) employed in NHP and we are working with our suppliers to adopt the same reward policy for their staff.

**Agency Workers** – NHP uses only specified, reputable employment agencies to source labour. All agencies are subject to a supplier approval process, and the practices of any new agency are always verified before accepting workers from that agency.

**Supply Chain** - All suppliers are subject to a supplier approval process, which includes certification and accreditation status, as well as self-assessment and scorecard process.

A NHP Supplier Code of Conduct is shared with suppliers to uphold standards expected by the organisation.

Northwood assesses and reviews its supply chain to consider risk of modern slavery and human trafficking for existing and new suppliers. Business review meetings and supplier scorecards are used as mechanisms to measure and monitor risk. This is conducted

annually in areas of low risk or quarterly in areas of high risk, as defined by the Global Slavery Index.

Suppliers are requested to share their ethical and social status via SEDEX.

Where NHP identifies indicators of modern slavery in its supply chain, it will work with the relevant supplier to implement effective measures to address the issue. If compliance with the code is suspected or proven to have been breached by any supplier, NHP reserves the right to request open and effective cooperation with verification, corrective remedial actions as well as the final option to terminate the commercial agreement.

### Training and Awareness to our Colleagues:

All supply chain management with procurement responsibility are to be trained on the Northwood Code of Conduct through a variety of approaches such as presentations and digital modules. NHP procurement managers have responsibility for implementing and monitoring compliance to supply chain activities in their respective areas.

We have communicated our Modern Day Slavery Policy to all our workforce, providing them with information on how to identify and report potential slavery within the workplace.

In addition, we have provided all our colleagues with information on how to identify signs of slavery in everyday life, along with details on how to report this outside of our organisation.

### Conclusion:

Slavery and Human Trafficking are serious crimes, and for NHP is please to submit this statement outlining our commitment to the aims of the MSA.

This statement is made pursuant to section 54(1) of the Modern Slavery Act and has been approved by the company's Chief Executive Officer who will review and update it annually.



**Dawn Roberts**  
**Group Human Resources Director**

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