

## Slavery and Human Trafficking Statement

Financial Year 2021 - 2022

### Norse Group Limited ("The Norse Group")

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps that the Norse Group has taken to ensure that slavery and human trafficking are not taking place within its supply chains or in any part of its business. This statement covers the financial period from 1 April 2021 to 31 March 2022.

#### Introduction from the Chief Executive Officer

Modern slavery and human trafficking remain a hidden blight in our society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. The Norse Group is totally opposed to any such abuses within our direct operations, our indirect operations, and our supply chain as a whole. We are proud of the steps we have already taken, and will continue to take, to ensure that slavery and human trafficking do not take place within any part of our business or our supply chains.

#### The Norse Group

Based in Norwich and wholly owned by Norfolk County Council, the Norse Group brings together facilities management specialist Norse Commercial Services Limited, multi-discipline property consultancy Norse Consulting Group Limited, capital assets holding company Norse Group Holdings Limited and care home provider Norse Care Limited. With a combined turnover in excess of £300m, Norse Group provides employment for over 9,000 people. We are an award-winning national business, working closely with Local Authorities across the country to deliver key services in communities. We collectively purchase millions of pounds worth of goods, services and works, and place a clear emphasis on the priorities that makes our business ethical, successful and sustainable.

#### Our Supply Chains

Our supply chains include:

- *Agency staff*
- *Building products*
- *Cleaning products*
- *Contractors, agency staff*
- *Food*
- *ICT Hardware*
- *Office Equipment and Furniture*
- *PPE and workwear*
- *Specialist contractors and equipment*
- *Stationery, books, publications, periodicals*
- *Vehicles*

We internally review our supply chain to evaluate human trafficking and slavery risks and we conduct supplier audits which review all aspects of the supply chain including safety, human trafficking, child labour and other legal requirements.

### **Our Policies on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking within our supply chains or in any part of our business. In keeping with our commitment to act ethically and with integrity in all of our business dealings, the following have been reviewed to ensure that there is no slavery or human trafficking in any part of our business or our supply chains:

- *Standard and Conduct of Behaviour*
- *Whistleblowing Policy*
- *Safeguarding Policy*
- *Supplier Code of Conduct*
- *Sustainable Procurement Policy*
- *Standard Terms and Conditions of Purchase*

### **Risk Assessment and Due Diligence**

The risk of slavery and human trafficking within our own organisation is substantially avoided due to our policies and procedures. As part of our initiative to identify and mitigate risk, we attempt to build long standing relationships with our suppliers and customers and ask our suppliers to ensure that they have adequate procedures in place to identify and prevent modern slavery and human trafficking within their own supply chains, and to notify us immediately of any actual or suspected slavery or human trafficking. We have recently introduced some additional questions to our tender process and, in addition, ask all our tenderers to confirm that they comply with the requirements of the Modern Slavery Act as part of their submission.

Furthermore, we conduct audits of our suppliers to monitor compliance with our expectations and legal requirements and, following the introduction of the Modern Slavery Act, have produced, and adopted, a risk matrix to identify higher risk suppliers, together with a Supplier Assessment Process to ascertain when a supplier audit should be triggered. Audits are carried out by both internal and independent auditors and if any issues are identified are raised during an audit the supplier is required to prepare a corrective action plan and resolve everything identified within an agreed time period.

We also have a system to encourage the reporting of concerns and the protection of whistleblowers.

### **Supplier Adherence**

We have zero tolerance to slavery and human trafficking within our supply chains and we expect all those within our supply chains, including Contractors, to comply with our values.

### **Training and Awareness**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business we provide guidance and training to our staff.

More generally, we actively support employee engagement, representation, dialogue and the ability of an employee to raise potential concerns or grievances.

### **Effectiveness and Review**

Any instance of slavery or human trafficking will be picked up as part of our internal auditing programme. We will continue to review and monitor our effectiveness through our auditing programme and in line with our policies and procedures and will adapt our procedures or introduce performance indicators should this prove necessary.

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and constitutes the Group's Slavery and Human Trafficking Statement for the financial year ending 31 March 2022.

Signed by



Justin Galliford  
Chief Executive Officer  
Norse Group Limited

Date: 8 December 2022