



Northern Divers Engineering - Modern Slavery Policy Statement

1. Introduction

Northern Divers Engineering is committed to preventing modern slavery in all its forms, including forced labour, human trafficking, and child labour, both within our operations and within our supply chains. As part of our efforts to uphold human rights and ethical practices, we ensure full legal compliance and remain proactive in combating modern slavery.

This policy outlines our commitment to raise awareness, ensure due diligence, and implement practical steps to prevent and address modern slavery.

2. Legal Compliance

Northern Divers Engineering is committed to full compliance with the UK Modern Slavery Act 2015, international human rights standards, and all applicable laws governing the prevention of modern slavery. We will continually monitor our business practices and supply chain to ensure that we meet and exceed the requirements of modern slavery legislation.

3. Raising Awareness of Modern Slavery

We are dedicated to raising awareness of modern slavery within our business, employees, and suppliers. This includes:

- Regular training and awareness programs for all employees, management, and suppliers on how to recognize the signs of modern slavery and understand its implications.
- On Line Training to all on our Flick Learning
- Clear guidelines and resources on identifying potential cases of modern slavery within our operations and supply chain.

4. Reporting Mechanisms and Whistleblowing

We are committed to ensuring that all employees, contractors, and suppliers are aware of the mechanisms available to report concerns about modern slavery.

- Employees and others in our supply chain are encouraged to report any suspected instances of modern slavery using our whistleblowing policy.
- The whistleblowing mechanism guarantees confidentiality, protection from retaliation, and swift investigation of all reports.
- Any concerns can be directed to the designated responsible person in the management team (as outlined below), who will act on such reports promptly.



5. Senior Management Responsibility

We have appointed Richard Watson, Operations Manager as the senior executive with ultimate responsibility for ensuring that Northern Divers Engineering adheres to this policy and takes necessary actions to prevent modern slavery in our operations and supply chain. This individual is accountable for ensuring that modern slavery risks are effectively managed and addressed.

6. Communication and Application

This policy applies to all employees, directors, and contractors at Northern Divers Engineering, as well as to our suppliers and business partners. We are committed to ensuring that:

- This policy is communicated to all stakeholders within the business.
- The policy is incorporated into supplier contracts, ensuring that all suppliers are aware of our commitment to preventing modern slavery.
- We will regularly review and update the policy to ensure it reflects the latest legal and best practice requirements.

7. Prohibition of Practices Contributing to Modern Slavery

We explicitly prohibit the use of any practices that contribute to the risk of modern slavery. These include, but are not limited to:

- Exploitative recruitment practices.
- Withholding of workers' wages or identification documents.
- The use of forced or compulsory labour in any form.

Any supplier found to be engaged in such practices will be subject to immediate review, and appropriate corrective actions will be taken, which may include termination of business relationships.

8. Due Diligence and Steps in Case of Modern Slavery Detection

Northern Divers Engineering will conduct regular due diligence on our supply chain to identify any potential or actual risks related to modern slavery. This includes:

- Undertaking supplier risk assessments and audits, focusing on high-risk sectors and regions.
- Implementing appropriate measures, including contract terms, to ensure suppliers adhere to ethical labour standards.
- Should modern slavery be detected, we will take immediate action to investigate and address the issue, including working with relevant authorities and stakeholders, and considering the suspension or termination of business relationships with any implicated parties.

9. High-Risk Materials and Labour Sourcing



We recognize that certain materials or labour sources may be at a higher risk of contributing to modern slavery. Therefore:

- We will identify and actively manage high-risk suppliers, regions, and sectors that are more susceptible to modern slavery practices.
- We will take extra precautions when sourcing materials or labour from regions with known risks, ensuring thorough vetting and regular oversight.

10. Conclusion

Northern Divers Engineering is committed to fostering an environment free from modern slavery and exploitation. We will continue to work diligently to ensure that modern slavery is not tolerated within our business or supply chain, and we will take all necessary steps to comply with relevant legislation and promote fair, ethical working conditions globally.

Our zero-tolerance approach means we may terminate our relationship with individuals and organisations if this policy is breached.

This policy will be reviewed annually.

John Sparrowe
Managing Director
09 Jan 2025