

	HUMAN RESOURCES POLICY	
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Created by: Victoria Stallabrass	Reviewed by: Kieron Hall	Authorised by: Fabien Gillen
UK MODERN SLAVERY POLICY		

Introduction and purpose

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). The Act imposes obligations on organisations of a certain size which carry on a business in the United Kingdom. Modern slavery can occur in various forms, including servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Nexans has adopted this policy with the aim of preventing opportunities for modern slavery occurring within its business and supply chains. In this policy, the term ‘modern slavery’ has the meaning given to that term in the Act.

This policy applies to all colleagues, vendors, contractors, and other third parties acting on behalf of Nexans.

At Nexans we are committed to running our business responsibly. Nexans has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and we expect the same high standards from all of our contractors, suppliers and other business partners.

We have a zero-tolerance attitude to modern slavery and we are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

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Prevention of Modern Slavery

In order to prevent the occurrence of incidents of modern slavery within Nexans and throughout our supply chain we shall:

- identify, monitor and assess those areas of our business and supply chain most at risk from modern slavery and implement initiatives to enhance risk management effectiveness, re-assessing at least biennially;
- engage with our contractors, suppliers and other business partners at the outset of our business relationship to convey to them this policy and to require them to comply with it, and with the principles enshrined in the Act, at all times;
- incorporate anti-slavery and human trafficking obligations as part of our procurement agreements and contractual processes and, where appropriate, carry out an audit and/or investigation of the activities of those contractors, suppliers or business partners deemed high risk; and
- provide training to relevant colleagues to facilitate achievement of the objectives of this policy.

Reporting Incidents

Colleagues, agency staff, external consultants and contractors working with Nexans are encouraged in the first instance to report any suspected wrongdoing to their Line Manager who will raise the matter with the UK HR Manager. Alternatively, they can raise the matter directly with the UK HR Manager.

Nexans has also made available an external Confidential Telephone/Web Reporting Facility provided by "Safecall" which colleagues can use to report suspected serious malpractice or wrongdoing. This offers a safe and confidential (and if necessary an anonymous) means for colleagues who may otherwise feel uncomfortable coming forward to their Line Manager or UK HR Manager, using any of the following methods:

- By calling Safecall at any time on 0800 915 1571, or
- Via the web at www.safecall.co.uk/report



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This Helpline/ Web Facility is managed and operated by an independent company separate from Nexans. Callers to the Helpline will be asked by trained operators for details of their concerns. Similar questions are used in the web facility. At the end of the telephone interview or submission of an online report, a report number will be allocated to facilitate call back or subsequent access to the website to check for a response, or to facilitate the provision of additional information.

Policy Violation

A colleague involved in a wrongdoing, will be dealt with in accordance with the Nexans UK Disciplinary Policy and Procedure.

An external party, such as an agency worker or contractor, will be reported to the relevant person's employer which may in turn result in the termination of the service contract with the contractor, contracting company, or agency worker.

Nexans may also take action to recover any losses sustained, which may include the issuing of civil and/or criminal proceedings against the colleague/contractor and/or other individuals concerned.

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Responsibilities

It is the responsibility of all colleagues to comply with this policy with a view to developing and maintaining a working environment at Nexans in which modern slavery is understood by all to be unacceptable. To this end, a copy of this policy is provided to all colleagues, who are expected to familiarise themselves with it and abide by its provisions. The Policy does not, however, confer contractual rights on individuals. It is fully expected that all colleagues will act reasonably regarding this issue.

Nexans requests suppliers to take part in its CSR approach by committing themselves in a continuous improvement approach towards the principles listed in our Supplier CSR Charter, which establishes the principles that suppliers shall adhere to their activities and sites worldwide.

Line Managers Must:

- Read, understand and follow the principles of this document and any associated document(s);
- Allocate sufficient and appropriate resources to implement and ensure compliance with this policy including ongoing training and awareness;
- Keep up to date with changes to this document and any associated document(s);
- Seek guidance from HR as appropriate;
- Deal with any complaint received seriously and in accordance with this document;
- Set standards of behaviour, role model appropriate behaviour and ensure these standards are adhered to within their area of responsibility;
- Take corrective action when behaviour falls short of acceptable standards.

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Human Resources Must:

- Read, understand and follow the principles of this document and any associated document(s);
- Ensuring that all managers and other colleagues who may deal with concerns or investigations under this policy receive appropriate training;
- Support Line Managers and provide guidance on the application of this document;
- Responsible for operating and maintaining internal control systems to prevent the occurrence of modern slavery in the recruitment, selection and employment of colleagues or other persons engaged via agencies to provide services for Nexans;
- Monitor the application of this document, ensuring fairness and consistency of treatment.