Northern Bear plc Modern Slavery Policy 2025

The Northern Bear plc family of businesses provides specialist building services to local authorities, housing associations, NHS trusts, universities, construction companies and national house builders throughout Northern England.

Northern Bear plc includes 10 businesses, each operating autonomously, with Northern Bear plc providing the additional security of group strategic management and financial consolidation. The businesses are: Alcor Handling Solutions Ltd, Isoler Ltd, Jennings Roofing Ltd, MGM Ltd, Arcas Building Solutions Ltd, Northern Bear Safety Ltd, Springs Roofing Ltd, Wensley Roofing Ltd and J Lister Electrical Ltd.

Northern Bear plc has almost 500 employees and operates in the United Kingdom.

A full description of the business and services we offer can be found on our website at northernbearplc.com

Our Commitments

Northern Bear plc is against any form human trafficking and modern slavery and we act ethically and with integrity in all our business relationships. We are committed to:

- Ensuring that there is no human trafficking and modern slavery within our supply chain or in any part of our business; and
- Implementing and enforcing effective systems and controls designed to address the risk of human trafficking and modern slavery.

Supply Chain Management

Our supply chain supports our businesses and enables us to provide services throughout the United Kingdom. It comprises a wide range of suppliers, from small/medium enterprises (SMEs) to global corporates, across many authorities.

We continue to pursue preferred supplier agreements with our strategic supply chain, developing and building on long-standing relationships and formalising agreements to the benefit of all parties.

To illustrate the breadth of our supply chain, it encompasses products and services from construction and engineering materials, plant machinery, personal protective equipment (PPE), through to IT hardware and software, recruitment agents and training providers. This range means that we consider our supply chain to be our primary area of risk from a human trafficking and modern slavery perspective.

Assessing Risk Through Supplier Due Diligence

We recognise that particular types of suppliers are likely to give rise to a higher risk of human trafficking and modern slavery, in particular those utilising lower-wage staff

such as security, couriers, cleaning, and those utilising manufacturers in low-wage countries, such as IT hardware.

Where, through risk assessment, we perceive a particular risk of human trafficking and modern slavery, we will undertake enhanced due diligence, asking additional questions during the procurement process tailored to the specific risks and utilising the resources and influence available to us to ensure the supplier meets acceptable standards.

Incorporating Human Trafficking and Modern Slavery Risk Reduction into Process

We have undertaken a review of our procurement process and identified opportunities where we can reduce the risk of human trafficking and modern slavery in our supply chain.

The result of that review is to introduce a set of checkpoints throughout the procurement process, from initial sourcing, through to contract approval, to ensure that at each stage the risks are considered and appropriate information is gathered and that supplier selection decisions are taken in the light of the risk of human trafficking and modern slavery.

Ongoing Monitoring

We understand the importance of active monitoring and auditing of our supply chain to ensure and maintain compliance.

Our supply chain questionnaire is issued each year to key suppliers, as well as at the outset of each relationship and upon renewals, to ensure that we can monitor on-going compliance and improvements amongst our supply chain.

Communication and Awareness Training

Any changes to our procurement process are communicated to all employees who have responsibility for suppliers and buying through training and policies.

Our Modern Slavery Act Policy is made available to all employees on line and referred to during our induction process.

Employment Practices

All our employees have a written contract of employment. The right to work in the UK is established prior to their employment starting. All employees are made aware of their statutory rights during the induction process.

Summary

This Statement is made in accordance to section 54 (1) of the Modern Slavery Act 2015 and constitutes Northern Bear plc's human trafficking and modern slavery statement for 2025.

The Board of Northern Bear plc has approved this statement and is responsible for implementing the policy and providing adequate resources, training and investment to ensure that human trafficking and modern slavery is prevented from taking place within our organisation or its supply chain.

This statement will be reviewed annually and made publicly available on our website, northernbearplc.com.

John Davies
Chief Executive Officer, Northern Bear plc
January 2025