N+P Group Modern Slavery Statement 2026	N+P Group Issue 4 Effective Date 01/09/2026
This N+P Group Policy and represents the N+P Group's direction to the business on this topic. Compliance with this Policy is mandatory through aligning N+P Group's processes and people's behaviours to the commitments below.	

Scope

This statement sets out N+P's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no labour exploitation in its own business and its supply chains.

N+P recognises their responsibility to take a robust approach to human rights and modern slavery risk. Our organisation is committed to preventing human rights and modern slavery risk in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

N+P recognises the high level of risk of this type of crime in the Energy & Recycling sector and proactively participates as a member of the Slave-Free Alliance and the associated waste & recycling working group to prevent and mitigate the risks of modern slavery.

We ensure our temporary workforce supplier has resilient processes in place to mitigate the risk of modern slavery and ensure information is accessible to colleagues in a broad range of languages.

Process owner

This process is owned by the Human Resource department.

Organisation's Structure and Countries of Operation

This statement covers the activities of N+P Group specialises in the trading, production, processing and supply of waste-derived alternative materials and fuels for industrial applications.

We currently operate in the following countries:

- Netherlands and the United Kingdom in manufacturing and trading environment
- Germany, Austria, France & Italy in a trading environment

Operational activities include waste processing, recycling, logistics, fuel production, material trading and commercial management. As of July 2026, the organisation employs approximately 434 employees (around 419 FTE), of which approximately 192 employees are based in the Netherlands and 242 employees in the United Kingdom.

The largest operational sites are located in Rotterdam, Farmsum, Crayford and Teesside. N+P combines manufacturing and trading activities and supports its operations through dedicated commercial, engineering, HSEQ, finance, HR and management functions.

The organisation's scale, international footprint and diverse operational activities position N+P as a significant supplier of alternative raw materials and fuels within the European circular economy.

International Standards

N+P's approach to modern slavery forms part of its wider commitment to respecting human rights throughout its operations and supply chain. Our approach is informed by internationally recognised standards, including the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct.

These frameworks guide N+P Group to identify, assess, prevent and mitigate potential adverse human rights impacts, including those related to modern slavery and labour exploitation.

In 2023 at our UK operations and in 2025 at our NL operations, a Slave-Free Alliance gap analysis was conducted in line with the UNGPs, OECD due diligence expectations and applicable business and human rights reporting requirements.

The findings from this assessment are being used to strengthen our approach to modern slavery risk management and support continuous improvement across the business.

N+P Group is committed to working collaboratively across its NL and UK to align relevant policies, procedures and governance frameworks with these international standards, supporting a consistent group-wide approach to human rights and modern slavery risk management.

Our Supply Chain

N+P has a vast majority of suppliers predominately based in either the Netherlands or United Kingdom. Our suppliers provide material for processing into a fossil fuel alternative or material that is treated to recover commodities that are traded.

Risks

Modern slavery can impact the energy and recycling industry in various ways, and has historically been targeted by criminals operating in this area through the use of illegitimate labour agencies. It is therefore vital that we keep informed of the latest risks and best practices in mitigating and addressing them.

We deem our main risks to be (examples):

- Our use of labour agencies
- Varying levels of visibility across our supply chain, particularly beyond the first tier.
- Language skills across certain parts of our workforce

Due Diligence

To address these risks, we conduct numerous activities, such as:

- Ensuring that agency personnel get the same pay rate as permanent staff
- Temp-to-perm process receives detailed review of employee details & risk to modern slavery
- Working towards audits of our supply chain / suppliers
- Taking steps to improve substandard suppliers' practices (as outlined in the anti-slavery policy)
- Duplicate record checks on employee data (addresses, contact details and bank accounts)

- Protection for Whistleblowers with the N+P Group Whistleblowing Policy

Our Policies and Responsibilities

N+P is committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our business policies reflect our commitment to acting ethically with all our business relationships.

The following policies support our business directive to remove any presence of modern slavery or human trafficking.

- N+P Anti-Slavery Policy - will ensure N+P eradicates any modern-slavery practices in the business and throughout our supply chain through robust due-diligence, procedures and our colleagues awareness.
- N+P Whistleblowing Policy - this provides a channel for colleagues to raise concerns of a modern slavery channel either to their line manager or confidentially to our independent hotline (Safecall).
- N+P Code of Conduct Policy - outlines the actions and behaviour expected of our colleagues when representing N+P. The policy strives to maintain the highest standards of colleague conduct and ethical behaviour when operating abroad and managing our supply chain.
- Procurement General Purchasing Terms & Conditions - help to ensure that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- Supply Chain - includes suppliers of goods, services, labour, logistics, facilities management, technology, contractors and professional support services internationally. We recognise that certain sectors and geographical regions may present a higher risk of modern slavery and human trafficking. We seek to mitigate these risks through supplier due diligence, contractual compliance requirements and ongoing supplier engagement. We expect all suppliers to uphold human rights, provide fair working conditions, and comply with the Modern Slavery Act 2015 and all applicable labour laws.

Training

N+P partner with specialist organisations to ensure robust training is available and delivered to line managers and key support function colleagues. Our colleague training will cover fundamentals like;

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties
- what external help is available

In 2026 N+P have enhanced our partnership with Slave-Free Alliance further through collaboration to translate training material from English to Dutch to continue our investment in training and awareness throughout all teams and operations in N+P Group.

Effectiveness

We continuously evaluate the effectiveness of our steps to address modern slavery risks in our business and supply chain, and seek to continuously improve our efforts.

In 2023, N+P completed a Gap Analysis with our partner Slave-Free Alliance.

During 2024, N+P invested in our frontline and middle managers to be trained in identifying modern slavery indicators to enable N+P to support anyone at risk of exploitation.

In 2025, we have developed an escalation process, which will enable us to have a clear framework in which to escalate a potential instance of modern slavery either in our business or supply chain.

During 2025, a Slave-Free Alliance gap analysis was completed for the Netherlands operations to assess alignment with the UN Guiding Principles on Business and Human Rights and OECD due diligence expectations. This work has enabled our focus on opportunities in 2026 directly linked to colleague awareness, policy development, governance and mechanisms for concerns to be escalated and effectively supported.

Also in 2026, we will see the review of our internal modern slavery escalation process alongside a full site assessment at our largest operations site. The assessment will enable direct engagement with colleagues across all levels of the business and will allow review of working conditions, identify potential risks and the effectiveness of existing controls.

The assessment will be led by the team at Slave-Free Alliance and form part of N+P Group Anti-Slavery week activities.

Continuous Improvement

We recognise that eliminating modern slavery risks requires an ongoing and evolving approach. As part of our commitment to continuous improvement, we regularly review and strengthen our policies, procedures, and business controls.

- Providing regular training and awareness programmes for colleagues to improve understanding of modern slavery indicators and reporting obligations.
- Encouraging the reporting of concerns through confidential whistleblowing channels and ensuring reported issues are investigated appropriately.
- Collaborating with external partners, customers, suppliers, and other stakeholders to share best practices and remain informed of emerging risks and developments.

Awareness-raising programme

Alongside colleague training and investment, N+P raises awareness of modern slavery issues by displaying posters across our sites outlining the following information.

The basic principles of the Modern Slavery Act 2015;

- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes N+P Group's Modern Slavery and Human Trafficking statement for the financial year ending 6th April 2027.

Change Log

Version	Changes	Date
V0.3	2024 update following internal review.	04/09/2025
V0.4	2026 update following internal & external SFA review.	28/08/2026

Approvals

NAME	POSITION	Stage	Signature
James Newby	HRBP	Prepared & Released	
Gerwin Aldus	HR Advisor	Prepared & Reviewed	
Bob de Bruijn	Head of HR	Approved	
Stijn Jennissen	CEO (N+P Executive Board)	Approved	