

## Modern Slavery & Human Trafficking Statement

### 1. Purpose and Scope

Nolvera Ltd is committed to conducting all business operations with integrity, transparency, and respect for human rights. We have a zero-tolerance approach to all forms of modern slavery, forced labour, and human trafficking within our business and supply chains.

Although Nolvera Ltd.'s annual turnover is currently below the £36 million threshold defined under **Section 54 of the Modern Slavery Act 2015**, we have chosen to **voluntarily publish this statement** as a demonstration of our ethical commitment to human rights, fair labour, and transparent business practices.

This statement outlines the governance framework, policies, and actions we have implemented to prevent modern slavery, forced labour, servitude, and human trafficking across our operations and supply chains management, and fair treatment of all individuals we engage.

### 2. Our Business

Nolvera Ltd operates as a staffing, workforce, and compliance management company, trading under Nolvera Staffing, providing recruitment, HR support, and labour solutions to clients across:

- Health, Social Care & Education (temporary and contract staffing)
- Industrial, Logistics & Hospitality
- Corporate & Business Support
- Technology & Digital Services

We supply skilled and vetted workers across the United Kingdom. We understand that as a staffing and recruitment organisation, we play a vital role in ensuring that all employment relationships are free from exploitation and fully compliant with UK labour laws.

### 3. Our Commitment

- We are committed to ensuring that:
- All employment is freely chosen.
- Workers are not forced, bonded, or trafficked.
- Workers have the right to leave employment upon reasonable notice.
- Recruitment fees are never charged to candidates.
- Workers' identities and rights to work are verified before any assignment.
- Wages are paid directly to the worker, in full, and without unlawful deductions.

Nolvera does not tolerate any form of human trafficking, forced labour, child labour, or exploitation in any part of our business or supply chain.

### 4. Policies in Relation to Modern Slavery

We have implemented the following internal policies to strengthen our ethical practices:

- 4.1 Recruitment and Selection Policy – Ensures all candidates are recruited fairly and legally with proper right-to-work verification, reference checks, and no recruitment fees to candidates.
- 4.2 Whistleblowing Policy – Encourages staff and workers to report unethical practices, exploitation, or concerns confidentially and without fear of retaliation.
- 4.3 Supplier and Subcontractor Code of Conduct – Requires all partners, subcontractors, and vendors to uphold our zero-tolerance stance on modern slavery and also mandates adherence to UK labour law, ethical standards, and transparent payroll practices.
- 4.4 Equality, Diversity & Inclusion Policy – Promotes a workplace culture that respects human dignity and eliminates discrimination and abuse.
- 4.5 Worker Welfare and Pay Policy – Ensures fair pay, holiday entitlement, and pension contributions under PAYE and AWR.
- 4.6 Compliance & Audit Policy – Requires regular checks of worker documentation, payroll, and welfare as part of our quality assurance process.

## 5. Risk Assessment and Due Diligence

As part of our compliance framework, we conduct due diligence across our operations and supply chain, including:

Verification of suppliers and subcontractors to ensure they hold valid compliance documents and follow ethical employment and recruitment standards and practices. Undertake worker interviews, welfare check and spot checks to ensure pay transparency, fair treatment and to also identify potential risks of exploitation.

Ongoing training for recruitment staff and compliance officers on detecting and reporting signs of modern slavery.

Include anti-slavery clauses in all supply and subcontractor agreements.

Maintain a risk register and review it annually as part of internal audits.

Reviewing supplier contracts to include clauses on compliance with the Modern Slavery Act.

We continuously monitor and improve our processes to identify, assess, and mitigate any potential risks related to modern slavery.

## 6. Training and Awareness

We provide ongoing training to all staff involved in recruitment, onboarding, and worker management to identify indicators of modern slavery and trafficking.

Training covers:

- Recognising signs of exploitation, coercion, or debt bondage.
- Reporting procedures under Nolvera's whistleblowing framework.
- Ethical supply chain management and candidate care principles.
- Updates aligned with Stronger Together and GLAA guidance.

We also provide awareness resources to clients and temporary workers to encourage reporting of concerns. This training ensures that all Nolvera employees act responsibly and uphold our shared commitment to protecting vulnerable individuals.

## 7. Governance and Accountability

Oversight of modern slavery compliance rests with the Board of Directors, led by the Compliance & HR Director.

Our governance framework ensures:

- Annual review and board approval of this statement.
- Regular reporting of compliance and welfare metrics.
- Integration of anti-slavery measures into recruitment, onboarding, and supplier approval workflows.

## 8. Reporting Concerns

We strongly encourage employees, workers, and suppliers to report any concerns about modern slavery or unethical conduct.

Concerns can be raised confidentially via:

Email: [compliance@nolveraltd.com](mailto:compliance@nolveraltd.com)

Phone: 020 3933 8254

In writing: Nolvera Ltd, 90-92 Butt Road HQ Wellington House, Colchester CO3 3DA

All reports are treated confidentially and investigated promptly by our Compliance Team.

Where criminality is suspected, we cooperate fully with enforcement bodies such as the Gangmasters and Labour Abuse Authority (GLAA), Home Office, and Police.

## 9. Monitoring and Continuous Improvement

Nolvera Ltd is committed to continually reviewing strengthen and improve our practices to combat modern slavery by:

Conducting internal audits and supplier reviews.

Engaging with external compliance consultants where required.

Benchmarking our policies against industry guidance and Procurement Policy Notes.

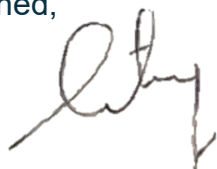
Updating training, documentation, and contractual clauses to reflect emerging risks.

Our long-term goal is to achieve formal third-party accreditation such as Stronger Together Business Partner Status and SEDEX/SMETA alignment.

## 10. Approval and Review

This statement has been approved by the Board of Directors of Nolvera Ltd and is made pursuant to Section 54(1) of the Modern Slavery Act 2015 for the financial year ending 2025

Signed,



Asamoah Darko Baffour

Director, Nolvera Ltd

Date: 15 October 2025

For more information or to report a concern, please contact  
**[compliance@nolveraltd.com](mailto:compliance@nolveraltd.com)**

