
NMS Infrastructure Limited

Modern Slavery and Human Trafficking Statement for the Financial Year 2021/22

Introduction

At NMSI Infrastructure Limited (the **Company** or **NMSI**) it is a priority to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and within our supply chain. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that NMSI has taken and is continuing to take to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its own business.

During the financial year November 2021 to October 2022 (FY22), construction took place on four healthcare facility programmes in four countries, namely Côte d'Ivoire, Ghana, Zambia, and Zimbabwe.

The Company Structure

NMSI is an engineering, procurement, construction, and finance project developer delivering turnkey social infrastructure across sub-Saharan Africa. Since October 2022, the daily operations and strategic direction of NMSI have been the responsibility of the Executive Management Board (**EMB**). The EMB reports into the Company's Managing Director and the Group Board.

Supply chains and contractors

To fulfil its activities, the main supply chains of the Company include those related to the supply of materials and equipment from various suppliers in the United Kingdom (**UK**) and other countries. Many of the Company's first tier (direct) suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers. Similarly, many of the Company's contractors used in the construction of our facilities often engage subcontractors to deliver work.

We expect all our contractors and subcontractors, whether based in the UK or elsewhere, to trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout their organisations and within their supply chain. We only work with reputable third parties and actively manage our first-tier suppliers and contractors, clearly communicating to them our high standards and the Company's expectation that these standards are passed down through their respective value chains.

NMSI's Commitment

The Company acknowledges its responsibilities in relation to tackling modern slavery and is committed to ensuring that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains and contractors.

The Company does not conduct business with any other organisation, in the UK or abroad, which supports or is found to involve itself in modern slavery. Moreover, no direct labour provided to the Company for the provision of its own services is obtained by means of modern slavery. The Company

strictly adheres to the standards required in relation to its responsibilities under relevant employment legislation in Cote d'Ivoire, Ghana, the UK, Zambia and Zimbabwe.

In addition to employment legislation, the Company is committed to international labour standards such as those laid out by the International Labour Organisation. The Company also complies with the International Finance Corporation's (IFC) Performance Standards (2012) as part of the typical funding requirements of our projects. Particularly relevant is Performance Standard 2 Labour and Working Conditions, of which one of the aims is "[to] protect the workforce by addressing child labor (sic) and forced labor".

Since becoming a signatory to the United Nations Global Compact in August 2022, the Company has committed to aligning its strategies and operations with the Ten Principles, which include respecting human and labour rights.

The Company's commitment to a zero tolerance for modern slavery and a respect for human rights is reiterated to our suppliers and contractors.

Policies

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The following is a representative sample of our policies which demonstrate a commitment to prevent modern slavery and human trafficking:

- **Code of Ethics and Working Code of Conduct** - This code is a set of core values in the areas of human rights, employment standards, the environment and anti-corruption.
- **Employee Code of Conduct** - The Employee Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- **Whistleblowing Policy and Procedure** - The Company aims to foster a culture that allows employees and contractors to feel comfortable reporting the identification of risks and any evidence of modern slavery or human trafficking taking place in its direct activities or its supply chains. Employees can report concerns regarding modern slavery and human trafficking in accordance with the steps set out in the Whistleblowing Policy and Procedure¹.
- **Recruitment Policy** - The Recruitment Policy ensures the fair, consistent and non-discriminatory best practice when recruiting into the Company in any of our locations.
- **Environmental & Sustainability Policy Statement** - Published on the Company's website in September 2022, among other sustainability principles, the policy details the Company's commitment to deliver programmes in accordance with international best practice, including the IFC Performance Standards.

Policies are reviewed and updated as the Company's understanding of and approaches to combat modern slavery and human trafficking change and develop.

Potential Exposure

We have assessed the risk of modern slavery and human trafficking within the Company, and we are of the view that the following areas give rise to the highest risks:

¹ No reports stating there was a concern of modern slavery and/or human trafficking were received from contractors, suppliers, or employees during the FY22.

- **Supply chain:** As a managing EPC contractor, sourcing a wide range of materials and equipment internationally, a considerable degree of the Company's risks in relation to modern slavery are deemed to be within our supply chain. By using contractors for construction (see below) there are also certain materials related to construction that we buy indirectly, making oversight and due diligence more difficult. Despite the risks of modern slavery and human trafficking associated with supply chains, the Company has not had reason to suspect such activity, nor has it been made aware of any allegations.
- **Construction contractors:** Workers in sectors that traditionally involve manual labour, such as construction, are disproportionately subject to forms of forced labour². Reasons for the greater exposure to modern slavery in construction include workers being hired informally for low-skilled tasks with casual work arrangements or no fixed salary. Our policies in relation to slavery and human trafficking are designed to mitigate these risks.
- **Location-specific risks:** The Company operates in Africa, a region with a comparatively high level of vulnerability to modern slavery³.

For the Company's direct labour, the assessed risk of modern slavery is deemed to be low. All Company employees are employed directly through the UK-based Human Resources (HR) Team. Therefore, despite some employees working in countries where local laws and regulations to counter modern slavery are not as effective as the UK, each employee is subject to the same robust hiring process. As a result, we consider the risk of modern slavery and human trafficking in our directly employed workforce to be low and managed through the internal policies and strategies implemented by the Company.

The assessed level of risk to different parts of the Company's operations to instances of modern slavery and human trafficking is used to determine the level of due diligence and ongoing management required to prevent its occurrence.

Due Diligence and Monitoring

Direct Employees

To ensure good hiring practices, the Company only uses reputable recruitment agencies to hire staff. As part of the onboarding process, all new staff are required to provide written verification that they have completed an online training video covering the risks of modern slavery in our business and supply chain within the first week of their employment.

Supply Chain

The Company has taken the following steps to ensure that modern slavery and human trafficking is not taking place in its supply chain:

- Making sure each existing or potential new supplier has completed the Supplier Questionnaire Form, which includes a question regarding whether the supplier has in place an anti-slavery

² In 2021, 16% of all adults who were identified to be in forced labour were working in construction, the third largest share behind services excluding domestic work (first) and manufacturing (second). Source: Global estimates of modern slavery: Forced labour and forced marriage (International Labour Office, 2022).

³ As of 2022, Africa has the highest vulnerability of any region globally to modern slavery, ahead of Arab States (second) and Asia and the Pacific (third). Source: The Global Slavery Index (Walk Free, 2023).

and anti-trafficking policy. The responses to the questionnaire alongside other information provided are assessed to decide whether that entity meets our Company requirements.

- Undertaking an assessment of the Company's services upon potential instances of modern slavery and human trafficking.
- Building long-standing, active relationships with suppliers, focusing on developing an alignment of values and building trust.

Contractors

In response to the identified higher level of risk when working with construction contractors on site, the Company undertakes due diligence by setting out a Labour Management Plan (**LMP**) within the Construction Environmental and Social Management Plan (**CESMP**). The LMP includes a review of the contractor's employment policy, code of conduct and model contract for its staff against local legislation and international guidance, including IFC Performance Standard 2, to ensure compliance.

Specific areas of focus include an assessment of contractors' commitments to at least the national minimum wage, recording and payment of overtime, a safe working environment, and access to an appropriate grievance mechanism. Contractors are required to monitor performance against these commitments during construction.

The Company also inspects workers' accommodation throughout the construction phase against guidance written by the IFC and European Bank for Research and Development (**EBRD**)⁴ to assess general living conditions, including dormitory, leisure, sanitation, and cooking facilities. While not a direct assessment of modern slavery, inspecting workers' accommodation gives an indication as to potential instances of modern slavery and, therefore, are used as a supplementary piece of due diligence by the Company.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the company's modern slavery and human trafficking statement for FY22. It was approved by the board on 19 September 2023.

Name: Matt Jordan
Position: Managing Director
Date: 19 September 2023
Signature:

A handwritten signature in blue ink, appearing to read 'MJ', followed by a horizontal line.

⁴ Workers' accommodation: processes and standards – A guidance note by IFC and the EBRD (2009).