

# New Era Technology UK Modern Slavery Statement 2025

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## 1. Introduction

New Era Technology operates in a wide range of legal and business environments.

We have a responsibility both as a business and as individuals to tackle any form of Human Trafficking (Modern Slavery) in line with protected global legislation such as the UK Modern Slavery Act (2015).

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor 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.

Our Company has a zero-tolerance approach to modern slavery, and 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 also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

Our zero-tolerance approach to Modern Slavery includes our commitment that:

- We will not allow any form of slavery or human trafficking to take place in any part of our business.
- We will not use child labour, nor will we use forced labour.
- We recognize freedom of association by permitting our employees to establish and join organizations of their own choosing without our permission.
- We will recognize collective bargaining where required by local laws.
- We will comply with all relevant laws, statutes and regulations relating to modern slavery.
- We will publish modern slavery statements in accordance with the relevant legislation.
- We require our suppliers and third-party providers to comply with the above; and to hold their own suppliers and third-parties to the same standards.
- We will seek to educate and raise awareness across our business in the identification and reporting of modern slavery.

This statement sets out the actions that we have taken or plan to take to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2025.

## 2. What is Modern Slavery

Modern Slavery is a crime and a violation of fundamental human rights. It is a term used to encompass slavery, servitude, forced compulsory labour, bonded and child labour and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The latest International Labour Organization (ilo.org) estimates show there are 50 million people worldwide in modern slavery. Modern slavery occurs in almost every country in the world, and cuts across ethnic, cultural and religious lines.

There is no typical victim of Modern Slavery, and some victims do not understand that they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of Modern Slavery or human trafficking:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.

- The person allows others to speak for them when spoken to directly.
- The person is dropped off and collected from work.
- The person avoids eye contact, is withdrawn or appears frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside of their immediate environment.

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

### 3. Internal Policies

New Era Technology operate the following policies for identifying and preventing slavery and human trafficking in our operations:

- Modern Slavery Policy – this policy sets out our commitment to ensuring transparency in our business and our approach to tackling modern slavery throughout our supply chains, to ensure our employees, independent contractors, suppliers and third-party agents observe high standards of business and personal ethics in the conduct of their duties and responsibilities.
- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. Employees can report concerns to their direct line manager, any member of the Senior Leadership team or Human Resources.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

### 4. Supply Chain Management

New Era expects our suppliers to share our commitment to act lawfully and ethically and to ensure that modern slavery is not taking place within their organization or their supply chain. At a minimum we expect our suppliers to:

- Comply with all applicable laws and regulations.
- Pay fair wages in line with legislation and awards for the industry and market.
- Provide a safe environment for their staff.
- Treat those who work for or on behalf of their business with respect, promoting an environment free from discrimination, harassment, and victimisation.
- Oppose Modern Slavery in all forms.

- Monitor supply chains on a continual basis and to promptly investigate any suspected non-compliance within its supply chain.

We do not carry on business or contract with any suppliers based in any of the countries listed as having the greatest prevalence of modern slavery by the Modern Slavery Index:

(<https://www.globalslaveryindex.org/2018/findings/global-findings/>).

We have a comprehensive new supplier onboarding process and supplier management program which includes undertaking an annual review of our supply chain to:

- Assess risks in the provision of particular services
- Audit the suppliers, and their health and safety standards, labour relations and employee contracts where relevant
- Require improvements to substandard employment practices
- Sanction suppliers that fail to improve their performance in line with our requirements

## 5. Responsibility for this Statement

The goal of eliminating slavery and human trafficking extends to all New Era employees, vendors and contractors. The Board of Directors of New Era has overall responsibility for ensuring this statement complies with our legal and ethical obligations.

On a day-to-day basis the UK Compliance Team has primary responsibility for implementing this statement, monitoring its use and effectiveness, dealing with any enquiries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this statement and are given adequate and regular training including on the issue of modern slavery in supply chains.

## 6. Modern Slavery Awareness and Training

Training on this statement, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced thereafter.

## 7. Measuring How We're Performing

At the end of 2025, we will undertake a review to measure how we are performing. Our measurements will include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our due diligence questionnaire?
- Number of complaints/grievances reported.

## 8. Statement Review

The UK Senior Leadership team review this statement annually and when there are any significant changes to our internal policies.

This statement covers 1<sup>st</sup> January 2025 to 31<sup>st</sup> December 2025.

**Approved by:** New Era Technology Managing Director, GVC International, Dawn Mulholland

**Date:** 1<sup>st</sup> January, 2025

**Approved by:** New Era Technology Board of Directors

**Date:** 1<sup>st</sup> January, 2025