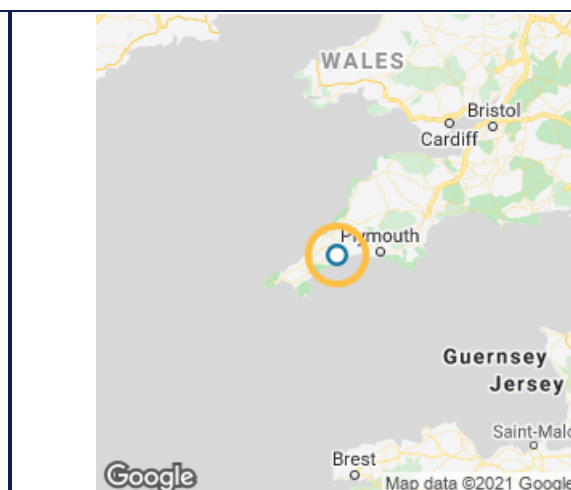


# Modern Slavery Assessment

D-U-N-S® number	<b>219168496</b>
Organisation name	<b>NINE GRP INTERNATIONAL LLP</b>
Location	<b>NINE GRP INTERNATIONAL LLP</b>
Address	<b>Par Moor Road, Par, PL242HW</b>
Country	
Purpose	<b>Administration</b>
Exported by	<b>Karl Glazebrook (admin@ninegrp.com)</b>
Exported date	<b>11-08-21</b>



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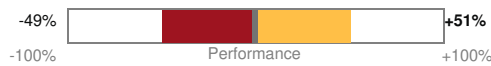
# Scoring

## Overview

Based on the responses given, performance ratings have been generated to quantify a measure of performance in each of sections of the assessment as well as an overall Total Score.

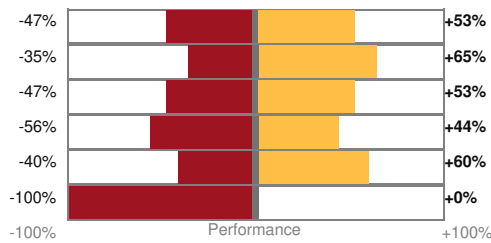
This rating can be used to identify areas of strengths and weaknesses and as a benchmark for assessment-to-assessment growth. Ratings have been coupled with a balanced Red-Amber-Yellow-Green scorecard to provide a visual standard for comparison.

## Total Score



Total Score

## Score per theme



Governance	Yellow
Policies and Procedures	Yellow
Risk Assessment and Management	Yellow
Due Diligence	Yellow
Training	Yellow
KPI	Red

# Recommendations

## Overview

A number of suggested improvements have been made, based on a analysis of your responses to the Modern Slavery Assessment. By implementing these suggested improvements, your organisation can improve its modern slavery statement and should be in a stronger position to mitigate modern slavery risks.

## Improvements

15 questions

**36.** Your organisation should ensure that your statement is published on your website's page (if applicable) with the link visible in a prominent place on the homepage. If your organisation does not have a website, it must ensure that it provides a copy of the statement to anyone who makes a written request for one within 30 days. (5/6)

*The Act is clear that statements must be published on an organisation's website with a link in a prominent place on the homepage. A prominent place may mean a modern slavery link that is directly visible on the home page or part of an obvious drop-down menu on that page. The link should be clearly marked so that the contents are apparent.*

*For organisations where there is more than one website we recommend placing the statement on the most appropriate website relating to the organisation's business in the UK.*

*Where there is more than one relevant website we recommend placing a copy of the statement or a link to the statement on each relevant website. This will increase transparency and ensure recognition for the efforts the business is making. There are two repositories for Modern Slavery Statements in the UK: [TISC Report](#) and the [Modern Slavery Registry](#).*

*Organisations should also consider publishing their statements on these registries so the public can more easily find them.*

- Yes
- No
- Not Applicable
- If applicable, please upload evidence of how you have address.  
Modern Slavery Statements Evidence.pdf

**39.** Your organisation should ensure that your latest statement includes information on the parts of your business and supply chains where risks of modern slavery are highest. (5/7)

*The Government encourages organisations to cover the following areas in your statement so that it demonstrates the range of activity required to properly address modern slavery:*

- 1) Information about your organisation and supply chains
- 2) Policies relating to modern slavery
- 3) The parts of your business and supply chains where risks of modern slavery are assessed to be highest
- 4) Due diligence processes in place to manage and prevent risks of modern slavery
- 5) Training and capacity building of staff around modern slavery
- 6) Key performance indicators your organisation uses to measure progress in tackling modern slavery.

*For further guidance on information you can include in your statement, see the Government guidance [here](#).*

- Yes
- No
- Not Applicable

**40.** Your organisation should ensure that your latest statement includes information on due diligence processes in place to manage and prevent risks of modern slavery. (5/7)

*The Government encourages organisations to cover the following areas in your statement so that it demonstrates the range of activity required to properly address modern slavery:*

- 1) Information about your organisation and supply chains
- 2) Policies relating to modern slavery
- 3) The parts of your business and supply chains where risks of modern slavery are assessed to be highest
- 4) Due diligence processes in place to manage and prevent risks of modern slavery
- 5) Training and capacity building of staff around modern slavery
- 6) Key performance indicators your organisation uses to measure progress in tackling modern slavery.

For further guidance on information you can include in your statement, see the Government guidance [here](#).

- Yes
- No
- Not Applicable
- If applicable, please upload evidence of how you have address.  
Nine Group Modern Slavery Reporting Policy Signed.pdf

**42.** Your organisation should ensure that your latest statement includes information on if key performance indicators are used to measure progress in tackling modern slavery. (5/7)

*The Government encourages organisations to cover the following areas in your statement so that it demonstrates the range of activity required to properly address modern slavery:*

- 1) Information about your organisation and supply chains
- 2) Policies relating to modern slavery
- 3) The parts of your business and supply chains where risks of modern slavery are assessed to be highest
- 4) Due diligence processes in place to manage and prevent risks of modern slavery
- 5) Training and capacity building of staff around modern slavery
- 6) Key performance indicators your organisation uses to measure progress in tackling modern slavery.

For further guidance on information you can include in your statement, see the Government guidance [here](#).

- Yes
- No
- Not Applicable

**44.** Your organisation should take steps to map your supply chain to understand the make-up and complexity. (10)

*It is important for organisations to have a good understanding of their supply chains in order to properly identify areas of high risk. Organisations should undertake a mapping exercise of their supply chains, starting by collecting information about their tier 1 suppliers.*

*Once organisations have mapped their tier 1 suppliers, they should seek to collect information on lower tiers to help them understand where risks may be greater. For further guidance on how to map supply chains, see the [Supply Chain School's Guidance Protocol](#). For country and regional level modern slavery data, see the [Global Slavery Index](#).*

- Yes
- No
- Not Applicable

**47.** Your organisation should ensure its modern slavery policies and codes should include the provisions described in the guidance below. (12)

*Your organisation's modern slavery policies and codes should include the following provisions:*

- Adherence to local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibits any threat of violence, harassment and intimidation
- Prohibits the use of worker-paid recruitment fees
- Prohibits compulsory overtime
- Prohibits child labour
- Prohibits discrimination
- Prohibits confiscation of workers original identification documents
- Provides access to remedy, compensation and justice for victims of modern slavery

*If policies and practices are to have the desired effect, they should be supported through effective communications and where appropriate, training, resourcing and collaboration of effort by appropriately skilled personnel. Policies should be established and clearly communicated so that anti-slavery activity within a company and its supply chains becomes embedded as standard practice, which all staff are aware of and incentivised to partner on and support.*

*Including these provisions explicitly in policies and working towards compliance with these practices in your business and supply chain will put your organisation in a stronger position to prevent modern slavery.*

*The charging of recruitment fees to workers is a practice underpinning many aspects of modern slavery. For guidance on how your organisation can work to prevent these fees being charged and leading to debt bondage, please see [IHRB's Guide to Implementing the Dhaka Principles](#).*

- Yes
- No
- Not Applicable
- If applicable, please upload evidence of how you have address.  
Nine Group Worker Welfare Policy.pdf  
Nine Group Salary Policy.pdf  
Nine Group Supplier Responsibility Policy Signed.pdf  
Nine Group Modern Slavery Reporting Policy Signed.pdf

**52.** Your organisation should ensure that high risk suppliers are required to adhere to your modern slavery policies as a contract condition. (11/13)

*Clear organisational policies demonstrate an organisation's commitment to this issue and ensures that appropriate and coordinated action is taken throughout the business.*

*Senior management approval ensures there is organisational 'buy-in'. Policies should be made available and communicated to workers in your organisation (and where possible, workers in your supply chains) so that workers are aware of the standards expected in their workplace and report violations. Having relevant staff trained on your policies will help ensure they are embedded in your organisation and training your suppliers will help ensure consistency in your supply chains.*

*For guidance on how to develop effective modern slavery policies, see [CORE Coalition's Beyond Compliance Guide](#).*

- Yes
- No
- Not Applicable
- If applicable, please upload evidence of how you have address.  
Nine Group Supplier Responsibility Policy Signed.pdf

**53.** Your organisation should ensure that high risk suppliers are trained on the relevant modern slavery policies. (11/13)

*Clear organisational policies demonstrate an organisation's commitment to this issue and ensures that appropriate and coordinated action is taken throughout the business.*

*Senior management approval ensures there is organisational 'buy-in'. Policies should be made available and communicated to workers in your organisation (and where possible, workers in your supply chains) so that workers are aware of the standards expected in their workplace and report violations. Having relevant staff trained on your policies will help ensure they are embedded in your organisation and training your suppliers will help ensure consistency in your supply chains.*

*For guidance on how to develop effective modern slavery policies, see [CORE Coalition's Beyond Compliance Guide](#).*

- Yes
- No
- Not Applicable
- Please explain why you believe this improvement is not applic..  
We are a micro company who has no direct need to complete this.

**54.** Your organisation should assess its purchasing practices and how this could potentially put pressure on your suppliers, leading to modern slavery. (14/14a)

*Organisations can have a profound impact on worker conditions in their supply chains through their purchasing practices. Certain purchasing practices can unintentionally put pressure on suppliers leading to poor recruitment practices, worker conditions and low pay for workers. Some examples of purchasing practices that could create these conditions include:*

- 1) Aggressive pricing that does not consider sustainable production costs
- 2) Short lead times
- 3) Late high-volume orders
- 4) Inaccurate forecasting
- 5) Late or extended payments
- 6) Withdrawing from contracts last minute
- 7) Unfair penalties for not meeting orders despite last minute changes
- 8) Accuracy of technical specifications

For further guidance, see the [Ethical Trading Initiative's Guide to Buying Responsibly](#).

Yes  
No

- **Not Applicable**
  - Please explain why you believe this improvement is not applic..
- N/A

**55.** Your organisation should consider modern slavery during each stage of its procurement process. (15)

*It is important to consider modern slavery issues at different stages of the procurement process to help reduce risks to your business. For example, during the tender stage, businesses should factor in labour costs in to their procurement and consider whether the price they are paying for goods and services are so low that the supplier (or the suppliers) are likely to be exploiting workers.*

For further guidance on factoring modern slavery issues in the procurement process, see the [Ethical Procurement for Health Workbook](#).

Yes

- **No**
- Not Applicable
- Please explain why you will not acknowledge this improvement

To date, Nine Grp International has identified only one stage between us and our suppliers, of which it is assessed in detail and repeatedly.

**58.** Your organisation should reconsider how it investigates its suppliers' modern slavery risks. (18)

*If an organisation has properly assessed the nature and extent of its exposure to the risk of modern slavery, it is highly unlikely that it will not identify any suppliers to be at higher risks.*

*Organisations may undertake desk-based research as a first step to understand where the highest risks may be and to help them when engaging suppliers that may be at higher risk.*

Organisations should consider using resources like the [Responsible Sourcing Tool](#) to help with their research.

- **Yes**
- No
- Not Applicable
- If applicable, please upload evidence of how you have address.  
Nine Group Supplier Responsibility Policy Signed.pdf

**61.** Your organisation should consider actively working with NGOs and other businesses to support its efforts to preventing and mitigating modern slavery. (20)

*Modern slavery is a complex problem that requires collaboration to prevent. NGOs and trade unions can help organisations take a more victim-focused approach to due diligence and help your organisation identify and mitigate modern slavery risks.*

*Organisations should consider participating in multi-stakeholder initiatives to improve conditions throughout their sector.*

You can find a list of organisations your organisation could work with to support your anti-slavery activity via the [Modern Slavery Map](#).

Yes  
No

- **Not Applicable**
  - Please explain why you believe this improvement is not applic..
- N/A in our area.

**62.** Your organisation should consider carrying out the following due diligence measures to ensure workers in your organisation and supply chain are not trapped in debt bondage. (21)

*Indirect methods of recruitment can provide an avenue for modern slavery, due to the absence of oversight and governance by the receipt organisation. The recruiter can employ various methods of exploitation such as implementing worker-paid recruitment fees, as a form of debt bondage.*

*It is important to note that workers can also become trapped in debt bondage for other reasons. Workers can be trapped in debt by employers for the provision of services provided by the employer, such as accommodation or healthcare. Workers can also fall in to debt bondage because of private debts incurred as a result of low pay and lack of healthcare provisions.*

*For further information on how companies can conduct due diligence to ensure responsible recruitment, see [Verite's Fair Hiring Toolkit for Suppliers](#) or [Verite's Fair Hiring Toolkit for Brands](#) and [IHRB's Guide to Implementing the Dhaka Principles](#).*

- **Yes**  
No  
Not Applicable
- **If applicable, please upload evidence of how you have address.**  
**Nine Group Salary Policy.pdf**  
**Nine Group Supplier Responsibility Policy Signed.pdf**

**64.** Your organisation should have processes in place for responding to a report of suspected instances of modern slavery that follows good practice. (23/23a/23b/23c)

*It is important to have a prompt and victim centred response to reports of modern slavery, so that victims are safeguarded and are supported in receiving justice and compensation.*

*Where an organisation's suppliers have alerted their customers of modern slavery, is cooperating with authorities, actively implementing corrective actions and is not found to be complicit, organisations should have no standard policy to immediately delist or suspend trade with that supplier because of that specific incident.*

*A Service Level Agreement (SLA) is a formally recognised agreement to react within a specific time frame and with a specific response. An SLA may be made explicit in an organisation's modern slavery policy.*

*For guidance on how your organisation and your suppliers can ensure they are well prepared, see [CIPS' Making a Plan for Remediation](#) or [Shift's Guidance on Remediation](#).*

- **Yes**  
No  
Not Applicable
- **If applicable, please upload evidence of how you have address.**  
**Nine Group Modern Slavery Reporting Policy Signed.pdf**

**66.** Your organisation should consider developing key performance indicators relating to its policy on modern slavery. (28)

*It is important for organisations to measure the performance of any anti-slavery actions it has undertaken to enable it to make improvements.*

*If an initial risk assessment highlighted issues in a company's operations or supply chain, a KPI could be introduced to measure progress against reducing that risk, for example improving conditions for those people.*

*A business could set targets for:*

- *Training and capacity building of staff about modern slavery issues*
- *Measuring changes in awareness of risk*
- *Appropriate decision making and swift action as appropriate*
- *Grievance procedures and whistle-blowing procedures for workers if cases or suspected cases are found*
- *Visibility, leverage and oversight of suppliers in relevant goods and services supply chains.*

*It is also good practice for KPIs to be reviewed regularly by senior management to ensure the KPIs are practical and achievable.*

*For further guidance on developing KPIs, see page 30 in the [Government's Practical Guidance](#).*

- **Yes**  
No  
Not Applicable



# Introduction

Section 54 (Transparency in Supply Chains etc.) of the Modern Slavery Act 2015 requires applicable commercial organisations to publish a 'modern slavery statement' for each financial year of their organisation, otherwise known as a TISC statement. It applies to all commercial organisations which carry on a business, or part of a business, in the UK, supply goods or services and have an annual turnover of £36m or more.

The Government encourages organisations, including those that do not fall in scope of the Act, to complete this assessment so that organisations have a framework to aid them in their journey to understanding and addressing modern slavery risks. If you have been invited to complete the assessment by the Government or any other public body, this tool should help them work in partnership with your organisation to improve how your organisation ensures workers aren't being exploited in your supply chains.

## What is modern slavery?

Modern slavery is an umbrella term used to encapsulate offences in the Modern Slavery Act 2015: involving slavery, servitude and forced or compulsory labour; and human trafficking.

## Why is it important?

Modern slavery is a serious and organised crime that destroys communities and causes significant harm to victims. It is the illegal exploitation of people for personal or commercial gain, and involve people being coerced and forced into providing service to others. Some estimates suggest that there were over 40 million people living in slavery across the world in 2016, many of whom will be working to produce the goods and services which we buy and sell every day. The Home Office estimated that there were 10,000-13,000 potential victims in the UK alone in 2013. It is a crime that affects men, women and children.

The Home Office estimates the total social and economic cost of modern slavery to the UK was £3.4-4.3 billion in 2016-17, making the average cost of modern slavery crime (£334,750) higher than the unit cost of any other crime type apart from homicide. Worldwide, the International Labour Organisation (ILO) estimates over \$150 billion of illegal profits are generated by traffickers per year. Unscrupulous businesses who use slave labour undercut good British businesses and if we are to eradicate this horrendous crime from the UK and the rest of the world, government and businesses must work together.

# About this Assessment

This assessment provides information about activity undertaken by NINE GRP INTERNATIONAL LLP to tackle modern slavery. It may be used to support the production of an annual modern slavery statement as set out in the UK Modern Slavery Act 2015.

Your responses can be updated at any time to maintain a current and accurate report. The Assessment has six sections, each of which captures information that may be included in a statement, as set out by guidance within the Modern Slavery Act 2015.

The answers you have provided will be kept confidential and will only be shared with buyers that you have given permission to access.

## **Company and point of contact:**

All information contained within this assessment has been submitted by a user or users acting on behalf of NINE GRP INTERNATIONAL LLP.

NINE GRP INTERNATIONAL LLP represents and warrants that the information provided within this declaration will be as accurate and complete as possible and shall accurately represent its capabilities.

The main point of contact for this assessment is:

Karl Glazebrook  
Director  
admin@ninegrp.com  
01726813979

## **According to the information submitted in support of this assessment:**

NINE GRP INTERNATIONAL LLP has stated that its turnover is 2370105.13 GBP.

NINE GRP INTERNATIONAL LLP has indicated that it is completing this assessment on behalf of its own organisation,

NINE GRP INTERNATIONAL LLP has provided the following additional information regarding their commitment to tackling modern slavery: N/A

**The Government encourages organisations not in scope to still consider publishing a statement as modern slavery risks can manifest in almost any organisation.**

# 1. Information About the Business and its Supply Chain

## About this section:

This section provides some basic information about your organisation and its business operations which will help to provide context for a modern slavery statement. Ensuring relevant and up-to-date information in statements will help your organisation communicate its efforts in the most effective manner.

For the purpose of drafting a Modern Slavery Statement, information to disclose could include:

- the sector(s) the business operates in and whether any of its work is undertaken by agency labour
- the organisational structure and group relationships
- the countries it sources its goods or services from, including high risk countries where modern forms of slavery are prevalent.
- the make-up and complexity of the supply chains
- the businesses operating model
- relationships with suppliers and others, including trade unions and other bodies representing workers

Having a good understanding of your supply chain helps to define the boundaries of the report and to support the identification of risk regarding modern slavery.

## Information about the business and its supply chains

7 questions

### 1a. Please enter your organisation details.

- Full name of your company  
NINE GRP INTERNATIONAL LLP
- DUNS number  
219168496
- Street  
Par Moor Road
- Town or City  
Par
- County or State  
Cornwall
- Postcode  
PL24 2SQ
- Country  
United Kingdom - GBR
- Date of registration in country of origin  
01/01/2013
- Registered company number  
OC382638
- Registered VAT number  
124 3608 38
- Registered website address  
www.ninegrp.com

### 1b. Do you want to complete this Modern Slavery Assessment for your organisation as a whole or for a specific contract?

- Organisation as a whole  
For a specific contract

### 1c. Please select the relevant sector(s) that your organisation operates in.

- Education
- Human health and social work activities
- Manufacturing
- Other
- Please specify  
Healthcare/Emergency Service

### 1d. Are you a Small, Medium or Micro Enterprise (SME)?

- Yes  
No

2. Which of the following members of your group structure are you completing this assessment on behalf of?

- **My own organisation**  
Immediate parent  
Domestic parent  
Global parent

3. Who is your organisation's main point of contact for this assessment?

- **First name**  
Karl
- **Last name**  
Glazebrook
- **Job title**  
Director
- **Email**  
admin@ninegrp.com
- **Telephone**  
01726813979

4. Please enter the turnover that is listed within your most recent set of annual accounts.

- **Turnover in GBP**  
2,370,105.13
- **Provide the end date of these latest accounts**  
30/12/2020

## 2. Policies Relating to Modern Slavery

### **About this section:**

The establishment of effective policies and incentives shape the environment and sets the tone of an organisation in assessing, preventing and mitigating the risk of modern slavery. Clear organisational policies demonstrate an organisation's commitment to this issue and ensures that appropriate and coordinated action is taken throughout the business.

Tackling modern slavery does not necessarily require a stand-alone policy. It could simply be adapting, and/or clarifying how existing policies and practices, programmes and management systems already work to prevent modern slavery.

If policies and practices are to have the desired effect they must be supported through effective communications and, where appropriate, training, resourcing and collaboration of effort by appropriately skilled personnel. Policies should be established and clearly communicated so that anti-slavery activity within a company and its supply chains becomes embedded as standard practice, which staff are aware of and incentivised to partner on and support.

Policies work best when supported by senior management and are updated and reviewed regularly.

5. Under Section 54 of the Modern Slavery Act 2015, is your organisation required to produce a Modern Slavery Statement?

- Yes
- Yes but not produced a statement covering 2017-2018
- **Not required but have produced a statement**
- **Please upload the statement**  
**Nine Group Combined Modern Slavery Statement 2021.pdf**
- Not required and no statement has been produced

6. Does your organisation's Modern Slavery Statement meet the following legal requirements? Tick all that apply

- **Approved by the board of directors (or equivalent management body)**
- **Signed by a director (or equivalent)**
- Accessible via a prominent place on your website's homepage
- None of the above

7. Does your latest statement include information on the following areas? Tick all that apply

- **Information about your organisation and supply chains**
- **Policies relating to modern slavery**  
The parts of your business and supply chains where risks of modern slave...  
Due diligence processes in place to manage and prevent risks of modern...
- **Training and capacity building of staff around modern slavery**  
Key performance indicators your business uses to measure progress in ta...  
None of the above

8. Was your latest statement produced within 6 months after your last financial year end, as per Government guidance?

- **Yes**
- No

9. Have any incidences of modern slavery been recorded or uncovered within your organisation or supply chains in the past 12 months?

- Yes
- **No**

10. Has your organisation taken steps to map your supply chains to support how your organisation identifies modern slavery risks?

- Yes
- **No**

10b. Which locations do you believe are at higher risk of modern slavery in your operations and supply chains?

- **China**
- **India**

11. Does your organisation have policies that are relevant to the prevention of modern slavery?

- Yes and they are publicly available
- **Yes but some/all are not publicly available**
- **Please upload relevant policies and provide information on wh.**
  - Nine Group Environmental Policy Signed.pdf
  - Nine Group Worker Welfare Policy Signed.pdf
  - Nine Group Salary Policy Signed.pdf
  - Nine Group Modern Slavery Training Policy Signed.pdf
  - Nine Group Modern Slavery Reporting Policy Signed.pdf
- No

12. Do your organisation's modern slavery policies or codes include any of the following provisions? Tick all that apply.

- **Adherence to local and national laws**
- **Freedom of workers to terminate employment**
- **Freedom of movement**
- **Freedom of association**
- **Prohibits any threat of violence, harassment and intimidation**
- **Prohibits the use of worker-paid recruitment fees**
- **Prohibits compulsory overtime**
- **Prohibits child labour**
- **Prohibits discrimination**
  - Prohibits confiscation of workers original identification documents
  - Provides access to remedy, compensation and justice for victims of moder...
- None of the above

13. Does your organisation meet any of the following good practice in relation to its modern slavery policies? Tick all that apply.

- **Policies are approved by senior management**
- **Policies are available to workers in your organisation and communicat..**
- **Policies are available to workers in your supply chain and communica...**
- **Relevant staff in your organisation are trained on these policies**
  - High risk suppliers are required to adhere to your modern slavery policies...
  - High risk suppliers are trained on the relevant policies
- None of the above

# 3. Assessing and Managing Risk

## About this section:

Modern slavery risk assessments should be seen as part of an organisation's wider approach to risk management and could form part of more general risk assessments that are carried out for a variety of reasons.

Appropriate resources are needed to ensure that risk assessment strategies can be effective. This means that the assessments should be able to identify the risks and issues, properly assess their level of importance, and ensure that appropriate remedies are in place.

Identifying relevant information from internal and external sources will help businesses to undertake effective risk assessments and appropriate review of those risks. Particular business risks to consider in assessing and managing risks to workers include:

- **Country risks:**
  - Exposure may be greater in global supply chains in countries where protection against breaches of human rights are limited, particularly with regard to rights of foreign contract workers to retain their own ID and papers, and/or where work arrangement by agents is common, etc.
- **Sector risks:**
  - There are different risks and levels of risk in different sectors. For example, the risks and arrangements which generate bonded labour situations for workers in the extractives sector may differ to those causes in manufacturing.
- **Transaction risks:**
  - Banks or financial institutions may be involved in facilitating financing from or supporting cases of modern slavery and bonded labour in operations or supply chains or through money laundering.
- **Business Partnership risks:**
  - Different supplier relationships and business partnerships will all carry different levels of risks. In some cases, existing long-term partnerships will involve less risk because the organisation will have a better knowledge of their partner's operations and policies. However, a new partnership or business relationship may be equally low risk as long as proper due diligence is conducted.

## Assessing and Managing Risk

7 questions

14. Have you assessed how your organisation's purchasing practices may create pressures on your suppliers that could lead to modern slavery?

- Yes
- No

14a. What aspects have you assessed? Tick all that apply.

- Aggressive pricing that does not consider sustainable production costs
- **Short lead times**
  - Late high-volume orders
  - Inaccurate forecasting
  - Late or extended payments
- **Withdrawn from contracts last minute**
  - Unfair penalties for not meeting orders despite last minute changes
  - Inaccurate technical specifications
  - Other

15. At which of the following stages during the procurement process does your organisation consider modern slavery risks? Tick all that apply.

- Needs identification
- Requirement definition
- **Tender evaluation (including scoring and adjudication process)**
- **Contract award**
  - In-life contract management
  - End of contract review
- **Please provide any further details on the answer options that ...**
  - Factor into labour costs when determining a price in the procurement process.
  - None of the above

16. Do you supply goods (to the buyer/s that invited you to complete this assessment) that have been identified by the US Department of Labor to be at higher risk of being produced by child labour or forced labour?

- Yes
- No
- Do not know
- Not applicable



17. Where have you identified there to be the highest risk of modern slavery in your organisation and your supply chains?

- Categories
- Vulnerable groups
- Types of work
- **Sectors**
- Other
- Have not identified

17d. Has your organisation identified any high risk sectors that it works with? Tick all that apply.

- Domestic work
- Construction
- Manufacturing
- Agriculture, forestry and fishing
- Accommodation and food service activities
- Wholesale and trade
- Personal services
- Mining and quarrying
- Other
- **None of the above**
- Do not know

18. Within the last 12 months, have you identified any of your organisation's suppliers as being at high risk of modern slavery as a result of your organisation's risk assessment?

- Yes
- **No - we have investigated our supplier risk and found none to be at high.**
- No - we have not investigated our suppliers' modern slavery risks

## 4. Due Diligence Processes

### About this section:

Human rights due diligence is a key concept in the UN Guiding Principles on Business and Human Rights (UNGPs). The UNGPs specify that due diligence processes should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.

Due diligence procedures should be:

- proportionate to the identified modern slavery risk,
- the severity of the risk, and
- level of influence a business may have.
- informed by any broader risk assessments that have been conducted (see Assessing and Managing Risk section above).

For the purpose of the Modern Slavery Statement, due diligence information could include:

- Actions taken to understand the businesses operating context
- Impact assessments undertaken
- Action plans to address and risk/actual instances of modern slavery and how actions have been prioritised
- Evidence of stakeholder engagement
- Business-level grievance mechanisms in place to address modern slavery
- Actions taken to embed respect for human rights and zero tolerance of modern slavery throughout the organisation

### Due Diligence

16 questions

19. Does your organisation undertake any activity to support workers in your supply chains have access to trades unions or other forms of worker representation?

- **Yes**
- Please provide further detail  
Nine Group actively accepts any worker who chooses to join a trade union.  
No  
Do not know

20. Does your organisation actively work with non-governmental organisations (NGOs) or other businesses to support its efforts to prevent and mitigate modern slavery?

- Yes - NGOs
- Yes - Businesses
- **No**

21. Has your organisation undertaken any due diligence to ensure that workers in your supply chains are not trapped in debt bondage as a result of how they were recruited?

- Integrated safeguards in to company policies
- **Raised awareness and built capacity of staff to understand risks of de...**  
Screen and evaluate key recruitment agencies/labour providers  
Monitor key recruitment agencies/labour provider for ethical recruitment a...  
Undertaken corrective action plan  
Developed action plan to make system improvements  
Participated in multi-stakeholder initiatives to make a wider impact  
Other action  
None of the above

22. Does your organisation take any measures to ensure workers in your organisation have access to a grievance mechanism to report incidents or suspected incidences of modern slavery?

- **Yes**
- No
- Do not know

**22a.** In which supply chain tiers does your organisation ensure that workers know their rights of employment?

Tier 1  
Tier 2  
Tier 3  
Tier 4

- **Not applicable**

**22b.** In which supply chain tiers does your organisation ensure that all workers have access to an anonymous grievance mechanism to report incidents or suspected incidences of modern slavery without any form of penalty?

Tier 1  
Tier 2  
Tier 3  
Tier 4

- **Not applicable**

**22c.** In which supply chain tiers does your organisation ensure that measures are in place to ensure migrant workers can report grievances and receive feedback in a language they understand?

Tier 1  
Tier 2  
Tier 3  
Tier 4

- **Not applicable**

**22d.** In which supply chain tiers does your organisation ensure that multiple communication channels are available to workers to report their concerns e.g. to a trade union representative?

Tier 1  
Tier 2  
Tier 3  
Tier 4

- **Not applicable**

**22e.** In which supply chain tiers does your organisation ensure that the effectiveness of this mechanism has been assessed with senior leadership engagement?

Tier 1  
Tier 2  
Tier 3  
Tier 4

- **Not applicable**

**23.** Do you have a Service Level Agreement (SLA) or any other process in place for responding to a report of suspected instances of modern slavery?

Yes

- **No**

**24.** Has your organisation undergone a social audit (or another form of audit which assesses labour conditions) within the last 12 months? Tick all that apply.

Yes, an internal social audit  
Yes, an external social audit

- **No audits carried out**
- **Please provide any further information**
- No audits carried out.

**25.** Does your organisation conduct any types of audits on its suppliers and their business activities or have any other process to investigate working conditions in your supply chain?

- **Yes**
- **Please provide further detail**

Nine Grp International uses a third-party contractor to provide these audits. Samples can be provided upon request.  
No

**25a.** Has your organisation identified labour rights issues in your supply chain as a result of these audits?

- Yes
- **No**

**25b.** How does your organisation conduct these audits?

- By organisation's own staff
- **By a third party**
  - Announced audits
  - Unannounced audits
  - Other

**25c.** How often do you audit these suppliers?

- Pre-contract
- Annually
- **Every two years**
- Every three years or more

**26.** Is there any further information you want to provide on the due diligence your organisation undertakes to manage modern slavery risks?

- **Please provide details**

Through policies, Nine Group makes sure there is no repercussions for reporting of modern slavery concerns, and endeavors to hold external suppliers to the same accountability.

## 5. Training Provision

### About this section:

Training is a fundamental way of raising awareness and ensuring that people understand the importance of a particular issue. It also helps people to understand what they need to do, and how to work together internally or externally if they encounter something that raises concerns.

Training may be targeted at different groups of employees within a business, including leadership, or at different businesses within a supply chain, and the training itself could take a range of different forms. It may range from detailed training courses to broader awareness-raising programmes.

Organisations should think about where training should be targeted to have the most effect. If those employees who might encounter victims directly are more aware of the indicators of modern slavery and of how to report suspected cases, and what actions they can expect the company to take, then they can raise flags, and help to root it out in a particular business or supply chain.

27. Does your organisation provide training to workers on modern slavery?

- Yes
- No

27a. Does the training cover the ILO's Forced Labour Indicators?

- Yes
- No

27b. What outcomes are expected? Tick all that apply across the different training your organisation provides.

- **Recipients understand indicators of modern slavery**
- **Recipients understand how to report suspicions of modern slavery**  
Recipients understand the Modern Slavery Statement requirements  
Recipients understand how to consider modern slavery risks in procurement  
Recipients become better equipped to undertake modern slavery due dilig...
- Other

27c. What format is the training? Tick all that apply.

- **E-Learning**  
Workshops  
Webinars  
Courses
- **Other**
- **Please provide details**  
Access to training videos and physical copies of information booklets within the place of work.

27d. Is this training mandatory for those who receive it?

- Yes
- No

27e. How frequently is training on modern slavery provided? Tick all that apply.

- **At induction**  
When a violation occurs
- **When a policy is updated**  
Every 6 months  
Every 12 months  
Other

27f. Who developed the training on modern slavery?

- **In-house staff**  
Third party  
Other

27g. Who delivers training on modern slavery?

- **In-house staff**  
Third party  
Other

27h. Is any of the training above provided to suppliers by your organisation?

- Yes
- No

## 6. Key Performance Indicators

### About this section:

This section examines your organisation's Key Performance Indicators, the areas they cover and their governance.

Key Performance Indicators (KPI): quantifiable value or metric to measure the activity and progress towards the achievement of intended results or objectives.

Performance indicators are important in driving the performance of a business and shaping the way it operates. They can also affect how exposed the business is to the risk of modern slavery.

KPIs could be used in a modern slavery statement in two ways. Firstly, businesses could choose to provide information on their existing KPIs and set out whether they have considered whether they make their business and supply chain vulnerable to modern slavery.

Secondly, this section of the statement could outline any additional KPIs which the company has introduced to measure the performance of any anti-slavery actions undertaken. If an initial risk assessment highlighted issues in a company's operations or supply chain, a KPI could be introduced to measure progress against reducing that risk, i.e. improving conditions for those people.

A business could set targets for:

- Training and capacity building of staff about modern slavery issues
- Measuring changes in awareness of risk
- Appropriate decision making and swift action as appropriate
- Grievance procedures and whistle-blowing procedures for workers if cases or suspected cases are found
- Visibility, leverage and oversight of suppliers in relevant goods and services supply chains

It is also good practice for KPIs to be reviewed regularly by senior management to ensure the KPIs are practical and achievable.

For further guidance on developing KPIs, see the [Government's practical guidance](#).

### KPIs

1 question

**28.** Does your organisation have any key performance indicators (KPIs) relating to how your organisation mitigates modern slavery in your organisation and supply chains?

- Yes
- No

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