



## **Modern Slavery: Our Slavery and Human Trafficking Statement FY2020/21**

This statement, published in accordance with provisions of the Modern Slavery Act 2015, sets out the policies, processes and actions we have taken during the financial year ended 30 September 2021 to prevent modern slavery in our businesses and supply chains. It is intended to cover all the business and undertakings of National Car Parks Limited ("NCP").

At NCP, we are committed to conducting business responsibly and have a zero-tolerance approach to all forms of modern slavery across our operations. We are committed to ensuring everyone who works for NCP does so in an environment where fundamental human rights are upheld, and we expect anyone that we do business with also upholds these principles as well. We are continuously working to improve our operations in practice reflect that expectation.

### **1. Our Business**

NCP is the UK's largest and longest-standing private car park operator. We operate more than 500 car parks servicing towns, cities, airports, and railway stations throughout the United Kingdom. To deliver parking services to our customers and clients, we employ over 900 people within the United Kingdom and have more than 750 active suppliers.

### **2. Our Supply Chain**

With over 750 active suppliers, it's crucial that NCP understands the level of risk posed by its suppliers in a modern slavery context. The majority of suppliers are based the United Kingdom (over 98%). The countries in which they are based are shown in the table below:

<b>Number of Suppliers</b>	<b>Country</b>
776	U.K.
3	Netherlands
2	Australia
2	Luxemburg
1	Ireland
1	Philippines



### 3. Our Values

NCP has introduced a focus on Kaizen. This is a concept that refers to ongoing and continuous improvement working culture. The idea is that every small improvement adds up and supports a safer and more successful business in all respects. This has been visible within the approach taken by NCP this year to improve how we identify and address risks within our supply chain and within our work force.

### 4. Focus on Wellbeing

As with many businesses and people around the world, the past two years have presented unique challenges for NCP and its staff. During this challenging period, NCP recognised the mental strain and vulnerability people have faced during the uncertainty presented by Covid-19. We prioritised the welfare and safety of our colleagues by supporting flexible working arrangements and encouraging working from home wherever appropriate. This was accompanied with mental health awareness and resilience training, as well as presenting creative suggestions as to how to stay connected with colleagues while working from home and the roll out of a quarterly anonymous staff engagement surveys have been distributed to all staff members. This year NCP also partnered with *Chasing the Stigma* as our chosen charity, to recognise the significance of mental health awareness both for colleagues here and overseas.

### 5. Our Governance & Policies

NCP's commitment to human rights and the eradication of modern slavery is shared throughout the business. Our policies support NCP in mitigating risks, both within our business and our supply chain. Responsibility for managing these policies varies policy to policy. However, our annual modern slavery statement is ultimately approved by our board of directors and signed off by our Chief Executive Officer, following a cross-departmental review.

#### a. Anti-Modern Slavery and Human Trafficking Policy

This statement is reviewed and updated each year, with an updated policy last issued during May 2021. The policy is an internal document that sets out the expectations we, as a business, have in relation to our zero-tolerance approach to modern slavery and human trafficking. It applies to all individuals working in NCP at all levels and grades (whether they are permanent, fixed term, or temporary) and all of NCP's subsidiaries.



#### **b. Whistleblowing Policy**

This sets out how NCP is committed to prompting high standards of openness, probity and accountability. Our whistleblowing policy is available for all staff to view on our intranet and is communicated annually. It sets out how complaints can be made, including the ability for these to be made anonymously.

#### **c. NCP Code of Ethics Policy**

This sets out NCP's expectations on how all colleagues are expected to behave. Colleagues receive a copy of it when joining our business, and an up to date version is maintained on our intranet. This is maintained by our HR department. Amongst other things, it requires colleagues to treat each other fairly and not to discriminate on any grounds, to always treat those who raise concerns of misconduct or malpractice in accordance with NCP's whistleblowing procedures and prohibits doing business with countries subject to trade restrictions, embargoes or sanctions. Failure to comply with this may result in disciplinary action.

#### **d. HR Recruitment and Selection Policy**

This policy is managed by HR and sets out NCP's commitment to equality of opportunity in recruitment, selection, promotion and all areas of employment. NCP aims to attract high calibre colleagues by ensuring that our recruitment and selection processes are effective, systematic and equitable. We recognise that colleagues are critical to our success, and the utmost importance is placed on ensuring that a consistent, fair and professional approach is applied throughout the recruitment and selection process. This enables us to employ the best people who possess the necessary skills and attributes, and who demonstrate the behaviours essential to fulfil our strategic ambitions.

NCP will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

### **6. Risk Management & Due Diligence**

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## Part A: Our People

### a. Recruitment and Fair Pay

To manage potential risks in relation to onboarding our employees, we ensure all our direct hires are subject to standard “right to work” checks, DBS checks and depending on the nature of the working permits, we may audit these from time to time. We have focused on staff wellbeing and taken steps to ensure all our staff are paid fairly.

### b. Changes to our recruitment processes

During the past year, our HR department has been working to develop a direct hire talent acquisition model to offer in house end to end recruitment services for our business, and the use of external recruitment agencies will be centralised and managed by a specific Talent Acquisition Term. It is anticipated that this will have many benefits for NCP, including enabling more control and procedures around how staff members will join our business. This will also give more centralised control of ensuring all external suppliers of workers to NCP have appropriate terms in place to protect NCP, and any temporary or contract hire relationships.

### c. Training and awareness

Our staff play a key role in mitigating risk(s) both within our business and supply chain, and we recognise that appropriate training and communication is essential. Our Learning and Development Team have been working throughout 2021 to build on our existing training and to launch a new modern slavery training module to all staff to ensure year-on-year improvement in terms of our commitment to identify the risks of, and remove all instances of, modern slavery, human trafficking and exploitation.

### d. Communication

NCP recognises communication is an essential part of raising modern slavery awareness within our business. All of NCP’s policies documents are made available either via internal communication channels as well as on our intranet. This statement will be distributed to all staff via internal communication channels following board approval and will be published on NCP’s website.

We recognise communication must be both ways, which is why during the past financial year, quarterly anonymous staff engagement surveys have been distributed to all staff members. We believe anonymous, company-wide surveys are a useful tool for understanding the wellbeing needs of all colleagues and to better recognised gaps in support they feel is needed.



#### **e. Whistleblowing Hotline**

In April 2019, NCP introduced a whistleblowing hotline to help create a culture where staff feel confident in raising concerns safely. A company-wide memorandum was emailed to all staff in at the beginning of FY2020/21 together with NCP's whistleblowing policy and information on the hotline, so that all staff are clear that there is a hotline service provided by an independent, external whistleblowing service provider that can be contacted. Once reports are made, responsible colleagues allocated to this are notified, so that if a report is received an investigation can be conducted and a response given to colleagues who have raised concerns within a specified timeframe.

### **Part B: Our Suppliers**

Our standard supplier terms and conditions require compliance with all applicable law, and reference compliance with NCP's requirements with regard to modern slavery. We reserve the right to terminate immediately for breaches of these clauses. While our terms may vary between suppliers, our Legal department maintains a guidance note on changes we are able to accept to ensure essential clauses are not removed from our standard terms unless appropriate in that particular instance.

During the past year, NCP has been investigating ways it can improve its supplier onboarding and supply chain risk management processes to ensure our Procurement team have access to support and are able to access up to date supplier information and ensuring compliance with NCP's onboarding requirements across the board. This review is ongoing, but we recognise NCP needs to focus on:

- implementing more robust risk-profiling by suppliers when onboarding new suppliers;
- re-thinking what we require of suppliers based on the risk profile;
- improving NCP's supplier vetting processes;
- improving the way we monitor supplier risk throughout the duration of the relationship; and
- conducting more audits of suppliers.



## 7. Measuring and Monitoring Progress

Our modern slavery statement will be reviewed annually by colleagues from Legal, HR, Risk and/or Procurement prior to it receiving board approval. This is done to ensure we are meeting our ethical and legal obligations and providing up to date information within NCP's statement. This annual review is a great opportunity for us to see how we have performed over preceding financial year, and how we can look to improve in the current year.

Our performance during the financial year ended September 2021 was assessed by examining the following key performance indicators:


- Number of NCP staff that have undertaken awareness training.
- Number of modern slavery complaints made to our whistleblowing hotline.
- Evidence or suggestion of any material breaches or reasons for concern.

Our goals for the financial year ending 30 September 2022:

- **Communication:** Ensure the Modern Slavery statement is communicated to all staff members as well as being uploaded to NCP's website.
- **Training:** Ensure new training is delivered to all NCP staff and ensure this is communicated and pushed to maximise staff engagement and increase the number of NCP staff who undertake this training in the next financial year.
- **Whistleblowing:** Maintain our high level of performance in relation to investigating all reports made to our external, independent, whistleblowing service provider within the target timeframes.
- **KPIs:** Improve on our KPIs/performance year on year and develop new KPIs.

## 8. Board approvals

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by our Board of Directors on 7 December 2021.

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Hiroyasu Matsui  
Chairman and Director  
December 2021