



Modern Slavery and Human Trafficking Statement

**We
Are
Neem.**

weareneem.com

Revision History

Version	Revision Date	Revised by	Section Revised
1.0	October 2023	Ronald Tweedie	Initial

Document Control

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Policy Statement

The statement sets down Neem Consulting Limited's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them..

This policy applies to all individuals working at Neem and any other individuals, contractors or companies providing services to Neem. Failure by employees to comply with the policy will result in use of the Neem Disciplinary Procedure and, depending on the circumstances of each case, may ultimately result in dismissal.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

2.1 Whistleblowing policy - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.

2.2 Neem Code of Conduct - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.

2.3 Corporate Social Responsibility (CSR) Policy - The Company's CSR policy summarises [how we manage our environmental impacts and] how we work responsibly with suppliers and local communities.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes [e.g. building long-standing relationships with suppliers and making clear our expectations of business partners AND/OR evaluating the modern slavery and human trafficking risks of each new supplier AND/OR invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship].

Performance Indicators

This policy does not prohibit the giving and receiving of promotional gifts of low value or normal and appropriate hospitality. However, in certain situations gifts and hospitality may amount to bribery if they do not comply with the ethical values for Neem and are given with the intention of persuading anyone to act improperly in the performance of their duties. Employees should speak to a member of Management immediately if they are concerned that a promotional gift or offer of hospitality may not comply with this policy.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires <<State e.g. all staff>> to <<State required training activity e.g. complete an online training course by <<date>>>> All records and documents relating to clients of Neem must be prepared and maintained with strict accuracy and completeness, including due diligence procedures.

Performance Indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including <<Provide examples of actions taken>> [e.g. requiring all [relevant] staff to have completed training on modern slavery by

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. Ronald Tweedie endorses this policy statement and is fully committed to its implementation.

Responsibilities

The responsibility for the implementation and monitoring of this policy lies with the Management Team. Ronald Tweedie, have overall responsibility for anti-corruption. The Management Team will regularly assess the risks of Modern Slavery and Human Trafficking in the business and provide any relevant training to those employees who may be at risk of being involved in situations where this may occur.