

Proper Northern Ltd

Wansbeck Workspace, Rotary Parkway, Ashington, England, NE63 8QZ

Policy Owner: Daniel Wilkinson, Operations Director

Date: 1 September 2026

Review Date: 1 September 2027

Anti-Slavery and Human Trafficking Policy

1. Purpose

Proper Northern Ltd is committed to acting ethically and with integrity in all business dealings. This policy sets out our approach to preventing modern slavery and human trafficking in our operations and supply chains, in accordance with the Modern Slavery Act 2015.

Proper Northern Ltd does not currently meet the turnover threshold that would require it to publish a statement under section 54 of the Modern Slavery Act 2015. We maintain this policy as a matter of good practice.

2. Our Position

Modern slavery is a serious crime and a violation of fundamental human rights. It takes many forms including slavery, servitude, forced and compulsory labour, and human trafficking. Proper Northern has a zero-tolerance approach to modern slavery and is committed to ensuring it does not occur in any part of our business or supply chain.

3. Scope

This policy applies to all directors and employees of Proper Northern Ltd, and to all contractors, freelancers and suppliers engaged to work on behalf of the company.

4. Our Business and Supply Chain

Proper Northern provides temporary event WiFi and permanent network installations across the UK. Our supply chain consists primarily of:

- Freelance network engineers, install technicians and event crew based in the UK
- Network hardware distributors, equipment suppliers and hire companies based in the UK
- Cabling, containment and consumables suppliers based in the UK
- Connectivity providers, including fixed line, mobile network and satellite operators
- Software and platform providers operating in the UK and internationally

Our direct supply chain is predominantly UK-based and consists of skilled professionals and established trade suppliers, so we consider the risk of modern slavery within it to be low.

We recognise that the manufacture of network hardware, cabling and electronic components takes place in global supply chains where the inherent risk is higher and where our visibility is limited. We address this by purchasing through established UK distributors and by favouring manufacturers who publish their own modern slavery and responsible sourcing statements.

5. Due Diligence

Proper Northern takes the following steps to identify and mitigate the risk of modern slavery:

- Engaging only with reputable, professional suppliers and freelancers with verifiable credentials and experience
- Ensuring all employees, freelancers and contractors are paid at or above the National Living Wage
- Verifying the right to work in the UK for all individuals engaged on company projects
- Agreeing rates in advance and never requiring anyone to work without a confirmed rate
- Purchasing hardware through established distributors rather than unverified sources
- Remaining alert to indicators of modern slavery or exploitation when working with suppliers, or when on site at events and venues alongside other contractors

6. Indicators of Modern Slavery

Staff and contractors should be alert to the following potential indicators of modern slavery and report any concerns immediately:

- Individuals who appear to be under the control of another person
- Individuals who appear malnourished, unkempt or show signs of physical abuse
- Individuals who are unable to speak freely, are accompanied at all times, or do not appear to be in control of their own documents
- Individuals who do not appear to be receiving fair payment for their work
- Groups of workers transported together, housed together and supervised at all times by the same individual

7. Reporting

Any concerns regarding modern slavery or human trafficking should be reported immediately to Daniel Wilkinson at connect@propernorthern.co. Concerns can also be reported to the Modern Slavery Helpline on 08000 121 700 or at www.modernslaveryhelpline.org.

Proper Northern will not penalise anyone who raises a concern in good faith.

8. Training and Awareness

Daniel Wilkinson is responsible for ensuring awareness of this policy and its implications. All contractors and freelancers engaged by Proper Northern will be made aware of this policy as part of their onboarding.

9. Review

This policy will be reviewed annually by Daniel Wilkinson, Operations Director, Proper Northern Ltd.