

A full-page background image showing a vast mountain landscape. In the foreground, a lush green tea plantation is terraced across a hillside, with rows of tea bushes and scattered trees. A dirt path winds through the plantation. In the background, steep, rugged mountains rise, their peaks partially shrouded in mist or low clouds. The sky is overcast.

NOJE LIMITED MODERN SLAVERY POLICY

Last reviewed: June 2025

NOJE Limited Modern Slavery Policy

Policy purpose

This policy applies across all entities operated by or affiliated with NOJE Limited, including but not limited to Social Impact Coffee, London Coffee Factory, the trade name HEJ Coffee, and any future entities established under NOJE. At NOJE, we are committed to ensuring that modern slavery and human trafficking have no place in our business or supply chains. This policy outlines the steps we take to identify, prevent, and address any risks related to forced labour, servitude, or exploitation within our operations and those of our partners.

What is Modern Slavery?

Modern slavery is the illegal exploitation of other people for personal or commercial gain. There are varying types including Human Trafficking and Forced labour. Further information on Modern Slavery can be found on the Anti-Slavery International Charity's [website](#).

The most common forms of modern slavery are as follows:

- **Human trafficking:** The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.
- **Forced labour:** Any work or services people are forced to do against their will under threat of punishment.
- **Debt bondage/bonded labour:** The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.
- **Descent-based slavery:** Most traditional form, where people are treated as property, and their "slave" status was passed down the maternal line.
- **Slavery of children:** When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.

Our business overview

The group's core business includes coffee roasting, wholesale supply, and café management, spanning from ethically sourcing and roasting green coffee beans to delivering high-quality products to hospitality venues, offices, and retail customers across the UK.

Our supply chain overview

NOJE sources a range of products and services required for its operations. These include green coffee beans, consumables (cups, lids, straws, tissues, etc.), food and drink supplies, cleaning products, packaging, coffee machines and related equipment, IT and internet services, transport and logistics, pest control, waste management, and utility provision. Supplies include both hardware and raw materials as well as fluids and perishable goods.

Suppliers are located both nationally and internationally. Most consumables, food items, cleaning products, and equipment are sourced from UK-based suppliers. However, certain

categories—such as green coffee—are imported through intermediaries from producing countries in Latin America, Africa, and Asia.

These international supply chains involve jurisdictions that may be classified as higher risk for modern slavery and labour exploitation, particularly in agricultural production. Countries of origin linked to green coffee supply include Brazil, Colombia, Ethiopia, and others, where sector-wide risks are recognised by agencies such as the Financial Action Task Force (FATF).

NOJE engages with importers and traders based in the UK who claim to work with traceable and ethically sourced products, but where relevant, elevated risk remains due to country of origin and sector. These areas are subject to ongoing monitoring in line with risk assessments and international guidance.

Our policies

This Modern Slavery policy emphasizes our commitment to acting ethically and with integrity in all our business dealings and relationships. It applies to our parent company, namely NOJE, as well as all our subsidiaries and trade names. We are dedicated to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere within our business operations or supply chains.

NOJE is fully committed to human rights in the workplace as shown in our [Human Rights Policy](#) and this extends to our zero tolerance approach to modern slavery, in all forms that it takes.

We are also committed to ensuring there is transparency in our own business, including our subsidiaries and trade name companies, and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the [Modern Slavery Act 2015](#). As part of this commitment, we expect the same high standards from all of our contractors, suppliers, business partners, and subsidiaries.

To further highlight the commitment we take at NOJE, along with our subsidiaries and trade name companies, and across our supply chain to tackle Modern Slavery, we have the following policies and procedures currently running in our company:

- [Code of Ethics, Conduct and Corporate Social Responsibility](#) - sets out what we expect from every single person working for and with NOJE. It also underlines our responsibilities to our people, partners and shareholders. Specifically, the Code includes a clear statement of our zero-tolerance stance on modern slavery.
- [Anti-Bribery and Corruption Policy](#) - sets out the responsibilities of both NOJE and our partners in regard to observing and upholding our zero-tolerance positions on bribery and corruption
- [Whistleblowing Policy](#) - we have implemented a process where employees can anonymously report legitimate concerns with the business and our supply chain.
- [Supplier Code of Conduct](#) - all suppliers are to now sign this code before we commence proceedings with them (and all suppliers whom we had contracted prior to this implementing this code have since signed). Part of this code highlights clear expectations

on how a supplier treats their employees and their support for the protection of internationally proclaimed human rights, fight forced labor (including modern slavery and human trafficking) and child labor.

- **Human Rights Policy** - this lays out our commitment to human rights in the workplace, respecting the dignity and worth of all employees, and our zero tolerance approach to child labour and modern slavery.

Who does this policy apply to?

This policy applies to all persons working for us or on our behalf in any capacity. That includes employees at all levels, company directors, temporary staff hired through an external agency, individuals temporarily assigned to us from another organisation, volunteers, interns, freelancers, suppliers, consultants, business partners, and any other third parties acting on behalf of NOJE.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Our due diligence

When contracting with new and existing suppliers, they are required to sign and adhere to our [Supplier Code of Conduct](#) to confirm that they also operate a zero-tolerance approach to exploitation and actively request that all our new suppliers/contractors comply with the requirements of the Modern Slavery Act 2015. If we become aware of any breaches, then we will make it clear to our suppliers and contractors that we will terminate contractual terms as a result of the breach.

We have specific commitments on preventing child labour, promoting labour rights in supply chains and helping to ensure good conditions of work and employment. For our suppliers, compliance with these laws are mandatory, and suppliers must be able to provide evidence of policies and due diligence procedures upon request.

Risk assessment

On an annual basis we conduct an [Ethics Risk Assessment](#). This identifies potential risks of Modern Slavery, as well as our process for managing and mitigating this risk.

We have disclosed our identified risks in the table below, where there is a level of risk in the form of modern slavery and the steps we take to manage/mitigate this risk.

Identified Risk	Stakeholder	Likelihood	Risk Management/ Mitigation Process
Risk of forced labour or child labour in coffee-growing regions	Coffee farmers and producers	Medium	We source through trusted importers who conduct due diligence and support ethical sourcing certifications (e.g. Fairtrade, Rainforest Alliance). We require them to provide documents where they specify they

			follow fair labour laws.
Poor labour conditions in outsourced packaging facilities	Packaging suppliers and logistics partners	Low	We partner with UK-based B-corp or SEDEX-audited suppliers where possible. We request evidence of labour practices and social compliance documentation.
Poor labour practices in third-party logistics or delivery partners	Delivery and logistics companies (e.g. DPD, Neko, First Mile)	Low	We work only with logistics and delivery partners that demonstrate clear commitments to ethical labour practices - such as providing safe working conditions, fair pay and sustainability. We seek suppliers with public labour policies or third party accreditation and review these credentials as part of our supplier vetting process.
Freelancers or consultants working without clear standards or fair terms	Freelancers, consultants providing services (e.g. design, marketing, repairs)	Low	When working with freelance professionals or consultants we use clear contracts that include ethical working standards. We choose collaborators whose values align with ours and maintain regular communication to ensure fair treatment and mutual respect.

Supplier and contractor compliance

NOJE is committed to working only with suppliers and contractors who uphold the highest ethical and legal standards, including full compliance with the UK Modern Slavery Act 2015.

NOJE must conduct the following process before entering into any business relationship with any new suppliers or contractors:

- Sign the [NOJE upplier Code of Conduct](#), which includes a clear zero-tolerance policy on modern slavery, human trafficking, and child labour, as well as mandatory adherence to human rights laws and due diligence requirements.

To ensure ongoing compliance and accountability:

- All suppliers are required to re-sign the Supplier Code of Conduct annually.
- NOJE notifies them of any updates to the Code and uses this review period to reaffirm expectations and collect updated documentation if needed.

This process reflects our proactive approach to ethical sourcing and ensures our supply chain partners uphold the same standards we set for ourselves.

Employee compliance

A clear summary of our Modern Slavery policy - with all details relevant to employees - is

available in our [Employee Handbook](#). This is distributed to all employees and must be read. This process happens on an annual basis.

All employees must:

- Read, understand, and comply with this policy.
- Actively contribute to the prevention, detection, and reporting of modern slavery in any part of our business or supply chains.
- Avoid any activity that could lead to or suggest a breach of this policy.

Identifying and Reporting Concerns:

Employees are expected to remain alert to potential signs of modern slavery. Some examples of suspicious behaviour may include:

- Individuals who appear fearful, anxious, withdrawn, or excessively submissive around others
- Workers who are always accompanied or spoken for by someone else
- Colleagues showing signs of physical abuse, neglect, or poor living conditions
- Individuals working unusually long hours with little or no pay
- People who do not have access to their own personal identification or travel documents
- Workers being transported in groups under supervision, with limited freedom of movement

If any employee believes or suspects that modern slavery is taking place—or may take place—they are encouraged to report it as early as possible. Concerns can be raised by notifying:

- Their line manager
- A Company Director
- Or, via the confidential process outlined in our [Whistleblowing Policy](#)

If any employee is unsure whether a particular situation constitutes modern slavery or unethical labour conditions, they should still report it for clarification.

Protection and Support:

NOJE is committed to creating an open and supportive environment where concerns can be raised without fear of retaliation. We will:

- Support any team member who raises a concern in good faith, even if the concern proves to be mistaken
- Treat all reports seriously and confidentially
- Not tolerate any form of detrimental treatment (e.g., dismissal, disciplinary action, threats) as a result of reporting concerns

If an employee feels they have been treated unfairly for reporting an issue, they should:

- Raise the concern immediately with their line manager

- If unresolved, escalate it through the [Grievance Process](#)

Where appropriate—and always prioritising the safety and welfare of affected individuals—NOJE will support and guide suppliers to address coercive, exploitative, or abusive labour practices within their own business and wider supply chains.

Some examples of suspicious activity to watch out for include:

- Individuals who appear fearful, anxious, or overly submissive in the presence of others.
- Workers who are unable to speak for themselves or have someone else always speaking on their behalf.
- Employees or contractors showing signs of physical abuse or poor living conditions.
- People who work excessively long hours but receive little or no pay.
- Workers who do not have access to their own identification documents or travel papers.
- Staff transported to and from work in groups under supervision, with limited freedom of movement.

If any team member has concerns about possible modern slavery, they are encouraged to report it confidentially to their manager or the designated safeguarding contact.

Breach of Policy

1. Employees:

Any NOJE employee found to be in breach of this policy—whether by directly engaging in, facilitating, or failing to report suspected modern slavery—will face disciplinary action. This may include:

- A formal warning
- Suspension pending investigation
- Immediate dismissal for misconduct or gross misconduct
- In the most serious cases, legal action may be pursued under the Modern Slavery Act 2015

2. Suppliers and Contractors

If a supplier or contractor is found to be in breach of our Modern Slavery Policy or the commitments outlined in our Supplier Code of Conduct, NOJE reserves the right to:

- Terminate the business relationship immediately
- Remove the supplier from our Approved Suppliers Database
- In the most serious cases, legal action may be pursued under the Modern Slavery Act 2015

Who is responsible?

NOJE has overall responsibility for ensuring this policy complies with all legal and ethical obligations, and that all those under our control comply with it.

NOJE has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries 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 policy and are given adequate and regular training (this training will be organised by us, NOJE) on it and the issue of modern slavery in supply chains.

As always, we open our doors and actively encourage you to comment on this policy and suggest ways in which it might be improved. For any comments, suggestions and/or queries on the Modern Slavery policy to please reach out to Mathew Keech, Managing Director.

Policy review

This Policy has been reviewed and approved by Mathew Keech, Managing Director, in June, 2025 and will be reviewed periodically on an annual basis. Approval method: Email confirmation.