



ecoefficiency

experts in waste management



Anti-Slavery Policy



Purpose of the Policy

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

This document sets out the policy of Ecoefficiency with the aim of the prevention of opportunities for modern slavery to occur within its business or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

As a company we have a zero-tolerance approach to modern slavery.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or those of our suppliers.

Steps for the prevention of Modern Slavery

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery through our partners and supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

All employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking chains and business partners, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains/business partners.

To underpin our compliance with practical steps, we intend to implement the following measures:

- Engage with our suppliers/partners both to convey to them our anti-slavery policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- Introduce contractual provisions for our suppliers/partners to confirm their adherence to the policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.



Responsibility for this policy

Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with or legal and ethical obligations.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery.

Actions to report modern slavery or human trafficking

The Company's Whistleblowing procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our partners or suppliers may be reported by employees in this matter.

The Whistleblowing procedure applies to employees.

In summary, employees should approach either their Manager or HR Manager. If the matter is extremely serious then the Managing Director should be approached. The nature of the complaint will determine the Company's next course of action.

Action should be taken in any of the following circumstances:

- a. You suspect a person acting on behalf of Ecoefficiency is seeking to exploit another in a way which could amount to modern slavery;
- b.
- c. You suspect that a person acting on behalf of our suppliers/partners is seeking to exploit another in a way which could amount to modern slavery;
- d. You have received an approach from a person acting on behalf of Ecoefficiency or one of our suppliers/partners who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- e. You have information which leads to the rational conclusion that a person acting on behalf of Ecoefficiency or one of our suppliers/partners is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Reports are kept in confidence, subject to the need for Ecoefficiency to act responsible and within the law. The source of reports will be kept confidential if possible, by law.



Safeguards

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under the policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detriment treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our suppliers/partners businesses'. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Communication and Awareness of this Policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Review

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis and at least annually and may be amended from time to time.

Signed: *Simon Raven*

Managing Director
July 2022

