

## **Anti-Slavery & Human Trafficking Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending December 2023.

### **Introduction**

Dennis Eagle Limited is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

We ensure that our suppliers are aware of our procedures and take appropriate measures to ensure that our suppliers adhere to the same high standards.

### **Our Organisational Structure and Operations**

Dennis Eagle Limited, part of the Terberg Environmental Group, has manufactured precision-made vehicles since 1907. Our experience and expertise allow us to produce pioneering refuse collection vehicles fully tailored to the needs of our clients. We manufacture and carry out service and maintenance work in numerous locations throughout the UK.

We employ 976 people across the UK with an annual turnover of £358m.

### **Nature of our Supply Chains**

We have over 400 direct and indirect suppliers across our operations. Our key suppliers are based in the UK and mainland Europe with a small percentage in China/Far East. We purchase components and materials including engine and drivetrain, steel fabrications & castings, lighting, electrical & electrical wiring, hydraulics, and plastics/rubber.

### **Due Diligence**

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

We carry out financial checks using Dunn & Bradstreet and we ask every potential new supplier to complete a Quality Control Plan Questionnaire which in summary assesses the quality and environmental procedures and accreditations in place. We also visit suppliers in person who we anticipate will be fundamental to our operations and who will supply in large quantities.

We aim to ensure that all our suppliers have agreed to and signed our Service Level Agreement (SLA) document which states the following:

*'We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Procedures reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.'*

We also provide each supplier with a copy of this statement which they sign for.

If suppliers are found to have substandard practices, we will take steps to ensure improvement including providing advice to suppliers and requiring them to implement action plans. We will invoke sanctions against suppliers that fail to improve their performance in line with an action plan or who seriously violate our SLA, including the termination of the business relationship.

### **Recruitment and Agency Workers Policy**

Our Recruitment Policy details our procedures for bringing employees into the business in line with all relevant legislation and our internal Equality Policy.



We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from them.

Our HR team continues to ensure that we comply with all applicable laws in the areas in which we are based. The Company always pays above the voluntary living wage or the legally authorised rates for training apprentices in the UK and we continue to hold voluntary living wage accreditation.

### **Employee Training**

We have provided specific Anti-Slavery and Human Trafficking training to directors, managers and key purchasing and commercial employees to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and in order to effectively operate our procedures aimed at mitigating this risk.

This training is incorporated into our new starter process and delivered to promoted managers, key purchasing and commercial employees and is internally audited annually to ensure compliance.

This statement as well as our internal Anti-Slavery Policy is published internally to raise awareness of this issue and the Company's commitment to preventing any instances occurring. Employees are encouraged to contact HR in confidence should they have any concerns to raise in relation to Modern Slavery or Human Trafficking.

### **Achievements during 2023**

- Maintained voluntary living wage accreditation.
- Continual mapping of our supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Ongoing evaluation of the modern slavery and human trafficking risks of each new supplier.
- Continued inclusion of our training requirements into our SLA to require our key suppliers to provide necessary awareness training to their own employees.
- Sustained delivery of Anti-Slavery and Human Trafficking training, to relevant new starters and promoted managers, key purchasing and commercial employees, to highlight responsibilities and to safeguard against engagement, facilitation or failure to report.
- Maintained annual audits to ensure compliance and the prevention, detection and reporting of modern slavery.

### **Future Action**

Looking to the future, we intend to continue to improve our efforts to ensure that modern slavery and human trafficking does not occur in any of our corporate activities by continuing to educate employees, identifying which operations are at highest risk of infiltration in relation to slavery and human trafficking and implementing corrective action if necessary.

**This statement has been approved by the organisation's board of directors who will review and update it annually.**



**Keith Day**  
Managing Director

15<sup>th</sup> January 2024