

## Scope

This document establishes the Modern Slavery Policy & Procedure for ‘the Company’ and ‘Company’ refer to the legal entities, Emico Ltd, their subsidiaries or group services. References in this policy to ‘our people’ are to employees of Emico Ltd across the Group.

## Purpose

Emico Ltd recognises that slavery and human trafficking are significant human rights issues and are committed to taking the required steps to mitigate the risk of these occurring within our business and our supply chain.

Emico Ltd has a zero-tolerance approach to any form of modern slavery or human trafficking. We are committed to acting ethically and with integrity and transparency in all of our business dealings and to implementing effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or supply chain.

The Emico Ltd Modern Slavery Policy & Procedure will be brought to the attention of all our people. This Policy does not form part of our people’s contract of employment and may be amended by the Company.

The policy is available on our Company website and will be reviewed annually to ensure it is fit for purpose.

## Introduction

The UK Government enacted the Modern Slavery Act 2015 (the Act) to better tackle the crimes of modern slavery and human trafficking, in all their forms. As well as consolidating the criminal offences relating to modern slavery and human trafficking, the Act also introduced a requirement for each business to publish an annual statement setting out the steps taken by the business to ensure that modern slavery and human trafficking are not taking place in the business or supply chains.

As an independent contracting business operating within the UK, we recognise that the groups of people who could potentially be affected by slavery and/or human trafficking issues are our directly employed workforce; agency workers and Personal Service Companies carrying out work on our behalf; subcontract staff working on our projects and the workforce of our supply chain who supply materials to our business.

Emico's Modern Slavery Policy has been devised in line with the Universal Declaration of Human Rights, the conventions of the International Labour Organisation and the UN's Guiding Principles on Business and Human Rights.

## Application

Emico Ltd has policies and procedures in place to ensure that we are conducting business in an ethical and transparent manner. The steps that we take to mitigate risks in relation to each of these areas are below.

## Permanently Employed Workforce

- We verify that all permanent employees have the right to work in the UK prior to any formal offer of employment is made. Please refer to the Company's Employee Selection & Competency Management Procedure and / or the Recruitment Policy & Procedure
- We make all employees aware of their working hours, annual leave / absence entitlements and other employment benefits via their Terms & Conditions of Employment
- We prohibit the use of forced labour and provide training on modern slavery to all employees. This is captured during the induction process and regular refresher training sessions organised for existing staff. Generally, our E-Learning platform is utilised for this.

## Agency Workers

- We engage agency workers who are provided by our vetted labour partners on the Emico Ltd Agency PSL (Preferred Supplier List)
- A Service Level Agreement (SLA) is reviewed and signed where Emico Ltd require all our labour partners to:
  - Confirm that their agency workers have the right to work in the UK
  - Confirm they do not charge their workers a work finding fee
  - Have procedures in place which mitigate the risk of recruiting forced or compulsory labour.

## Personal Service Companies

- We engage Personal Service Companies either directly or through our vetted labour partners on the Emico Ltd Agency PSL (Preferred Supplier List)
- Those engaged directly with Emico must sign a Professional Services Agreement which confirms:
  - That they have the right to work in the UK
  - That they do not charge their workers a work finding fee if they have others engaged through their Personal Service Company.
- The above also applies to any Personal Service Companies engaged through our vetted labour partners.

## Subcontractors

- We require subcontractors to provide evidence that they verify their employees have the right to work in the UK
- We consider the subcontractors approach to employee rights and any breaches of human rights related legislation during our selection process
- We ask all site-based operatives to provide evidence of the necessary cards to attend work on a project i.e., ECS or CSCS
- We require all subcontractors who purchase materials for use on our sites to consider the risk of modern slavery in their supply chain.

## Child Labour

We require all of our suppliers to adhere to the standards set out by the International Labour Organisation with regards to the employment of children and young people. In particular:

- Children must not be recruited before they have reached the age of completion of compulsory schooling, and in any case not before the age of 15; and those under 18 must not be required to perform hazardous duties.

## Supply Chain

- We procure the majority of our directly sourced materials from UK based organisations that are required to comply with UK law in respect of forced labour
- Where materials are directly sourced from outside of the UK, we consider the risk of slavery and human trafficking as part of our selection process. Those suppliers are vetted accordingly.

Due diligence is undertaken on all the above areas prior to allowing them to operate within the Company or supply materials.

## Spotting The Signs

Signs that someone might be a victim of modern slavery include:

- Show signs of injury, abuse, and malnourishment
- Look unkept, often in the same clothing and have poor hygiene
- Be under the control and influence of others
- Live in cramped, dirty, overcrowded accommodation
- Have no access or control of their passport or identity documents
- Appear scared, avoid eye contact, and be untrusting
- Be collected very early and / or returned late at night on a regular basis
- May have inappropriate clothing for the work they are performing, and / or a lack of safety equipment
- May be isolated from the local community and their family.

It can include victims that have been brought from overseas, and vulnerable people in the UK, being forced to illegally work against their will in many different sectors, including brothels, nail bars, factories, construction, hospitality, car washes and agriculture.

## Measuring Effectiveness

In order to monitor the effectiveness of the steps we have taken to stop slavery and trafficking taking place in our business and supply chains, we will use the following performance indicators for the financial year ahead:

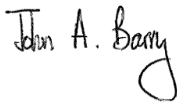
- All employees will have completed the relevant training, as referenced above.
- We have issued our Modern Slavery Policy & Procedure to our workforce through our induction process and the Company's Integrated Management System (IMS). It is also available on our Company website. This shows we clearly communicate our stance in relation to modern slavery.
- We will establish a process to gain a better oversight of our direct supply chain and consider how best to risk assess, carry out due diligence and communicate with these suppliers in relation to modern slavery issues. We will consider whether it is appropriate to raise specific questions in relation to slavery and trafficking with these suppliers.
- As we develop our risk assessment and due diligence processes, we will assess and consider the appropriateness of developing further measures, where we assess that there may be a heightened risk of slavery and trafficking within those organisations. We will take appropriate measures to encourage and persuade them to adopt their own measures to minimise the risks of slavery and trafficking within their own organisations and the supply chain beyond.
- Emico will carry out audits of selected supply chain partners in order to monitor and assess the risks of modern slavery.

## Raising Concerns & Handling Breaches

All individuals, regardless of employment status, can utilise the Emico Whistleblowing Policy & Procedure to confidentially raise issues or concerns in respect of any aspect of ethics or compliance, including slavery and / or human trafficking.

If a concern is raised on Modern Slavery (whether openly or anonymously), Emico will investigate this, and anyone found in breach of actions that contravene our Modern Slavery Policy or the Modern Slavery Act 2015 (the Act) will invoke the Disciplinary Procedure for employees. Should this be a supply chain member / labour partner, Emico will share its investigation findings with the relevant company to respond and carry out their disciplinary process, where applicable. The findings may result in a suspension or the ceasing of a relationship / engagement.

Should you have any questions, please do not hesitate to contact the Group Managing Director or HR.



Signed:

Name: John Barry

Job title: Group Managing Director

Date: October 2022