

## MODERN SLAVERY POLICY STATEMENT

**Maylarch Environmental Limited** (The Company) is committed to ensure, so far as is reasonably practical, acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

The Modern Slavery Act 2015 ("The Act") is focused on tackling human trafficking and slavery, but also introduces an obligation on Companies to be more transparent in their dealings with supply chains. The Group Managing Director of Maylarch Environmental Ltd, has ultimate responsibility for preventing modern slavery within the Company.

Maylarch is committed to meeting its legal obligations under the Act in both its business and supply chains. In addition, the Company is committed to upholding the ethical standards and fundamental human rights as set out in the ILO Declaration on Fundamental Principles, and the UN Guiding Principles, and in raising awareness of modern slavery issues including how to spot the signs in the business and supply chain. This policy is supported by our procurement procedures, grievance procedures and whistleblowing policy (A10).

This policy will be communicated within the Company, and Maylarch's supply chain. Maylarch expects its suppliers to operate to the same standards. The Company will carry out due diligence as part of our approved supplier process and expects suppliers to carry out their own due diligence to prevent and be able to identify modern slavery in their own supply chain.

Modern slavery and human trafficking are a crime and a violation of human rights.

- Modern Slavery - is used to denote situations where one person deprives another person of their liberty in order to exploit them for personal or commercial gain.
- Human Trafficking - is the act of recruiting, transporting, transferring, harbouring or receiving a person, through any coercive means (such as threat, use of force, deception or abuse) for the purpose of exploitation. Where the victim is under 18 years of age, there is no requirement of coercive means.
- Forced Labour - is any work or services which people are forced to do against their will under the threat of some form of punishment. Almost all slavery practices, including trafficking in people and bonded labour (labouring to pay off debt or other obligations), contain some element of forced labour.

Maylarch and all those working for or on behalf of it are required to comply fully and to behave in accordance with the Act, the ILO/ UN guiding principles, and this Policy. The consequences of infringing the Act are extremely serious both for the company and for individual employees and may include the imposition of significant financial penalties. Ignorance of the law is neither an acceptable excuse or defence to non-compliance, and the Act makes it clear that the consent of the victim is not an automatic defence.

All migrant workers will be treated in accordance with UK legislation and existing company HR policies and practices and will be subject to the same employment contract terms as other potential recruits.

Maylarch are committed to address and directly prohibit practices that are known to contribute to the risk of modern slavery, and require that the following practices are complied with:

### **Forced or involuntary labour**

Workers shall not be subject to any form of forced, compulsory, bonded, indentured or prison labour. All work must be voluntary and Workers shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length as required by their employment contract.

### **Recruitment fees**

Workers shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with processing official documents and work visas in both home and host countries.

### **Document retention**

Workers must produce documents evidencing their right to work either at interview stage or as part of induction checks by their employer. Copies must be taken and retained in line with GDPR. Confiscating or holding on to identity documents or other valuable items, including work permits and travel documentation (such as passports) is strictly prohibited.



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### Contracts of employment

Workers must be provided key terms of their employment prior to commencement, and a written statement of the full employment terms within 2 months of commencement. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) are strictly prohibited.

### Deposits

No Workers will be required to lodge deposits or security payments at any time.

### Humane treatment

The workplace shall be free of any form of harsh or inhumane treatment (such as harassment, mental or physical coercion, or verbal abuse of Workers; nor shall they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour) for all Workers and potential Workers.

### Workplace equality

All employees, irrespective of their nationality or legal status, shall be treated fairly and equally.

### Wages and benefits

All Workers shall be paid at least the minimum wage required by applicable laws and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals and directly to all Workers, in accordance with national law, and shall not be delayed, deferred, or withheld. Only deductions, advances, and loans authorised by national law or as set out in company policies are permitted and, if made or provided, actions shall only be taken with the full consent and understanding of Workers. Clear and transparent information shall be provided to Workers about hours worked, rates of pay, and the calculation of legal deductions.

### Working hours

Workers shall not be forced to work in excess of the number of hours permitted in national law. Where the law is silent, normal working hours shall not exceed eight per day and forty-eight per week, and should comply with flexible working time policies and or normal company contractual hours and total working hours including overtime shall not exceed sixty. All overtime shall be purely voluntary, unless part of a legally recognised collective bargaining agreement. Payment for over time will be in accordance with employment contracts.

### Freedom of movement and personal freedom

Workers' freedom of movement shall not be unreasonably restricted. Mandatory residence in employer-operated facilities shall not be made a condition of employment.

### Private employment agencies and labour recruiters

Workers should be hired directly whenever possible. When the subcontracting of recruitment and hiring is necessary, the company shall ensure that the labour agencies it engages operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places employees at risk of forced labour or trafficking for labour exploitation.

### GRIEVANCE PROCEDURE

The company has in place grievance procedures to ensure that any Employee, acting individually or with other Employees, can submit a grievance without suffering any prejudice or retaliation of any kind.

### DISCIPLINARY PROCEDURES

Any breach of this policy by an Employee should be dealt with in accordance with the Company disciplinary procedures.

### REPORTING, REFERRAL AND QUESTIONS

Workers who have any concerns over matters relating to this policy should raise them in accordance with the Whistle-Blowing Policy (A10).

This policy will be reviewed every 3 years as a minimum and modified, if considered necessary, to reflect the impact of changes to any provision.

*Rob Fluckiger*

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Group Managing Director