

# **Edenreach**

## **Anti-slavery Policy & Statement**

### **Statement**

Modern slavery is a violation of fundamental human rights and a criminal offence under the Modern Slavery Act 2015 (the "Act").

It takes various forms, such as slavery, servitude, forced and 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.

Edenreach has a zero-tolerance approach to modern slavery, and 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 in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our 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 as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

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

### **Responsibility for the policy**

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

Edenreach 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 on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

### **Compliance with the policy**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager or a member of senior management as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or a member of senior management or report it in accordance with our Whistleblowing Policy as soon as possible.

Note that we will support and advise our suppliers to help them address coercive, abusive, and exploitative work practises in their own businesses and supply chains, as appropriate, and keeping the welfare and safety of local workers as a priority. Raise the issue with your line manager or a senior management member if you are unsure whether a specific act, the treatment of workers in general, or their working conditions within any tier of our supply chains constitute any of the different types of modern slavery.

We want to promote openness and will assist anyone who, in accordance with this policy, raises sincere concerns in good faith, even if those concerns turn out to be mistaken. We are dedicated to making sure that nobody experiences any bad treatment as a result of reporting in good faith their suspicions that modern slavery, in whatever form, may exist in any area of our own business or in any of our supply chains.

Detrimental treatment includes firing, reprimands, threats, or other unfavourable treatment because you raised a concern. If you think you may have received such treatment, you should notify your line manager right away.

### **Risk assessment**

Before starting business with any of our supply chains a thorough risk assessment is conducted. The following is taken into account:

- The individual countries status on slavery according to relevant global studies of modern slavery.
- The type and variety of services the supplier conducts.
- Employment of vulnerable demographic groups.
- Global news analysis and labour and human rights organisations' observations.

We will also require all suppliers to attest to:

- They don't withhold workers' salaries for any reason.
- Don't demand workers give up their passports or work permits as a condition of employment.
- Don't use any type of forced, compulsive, or slave labour.
- They give each employee an employment contract that includes a reasonable notice period for terminating employment.

### **Communication & awareness of this policy**

All new employees shall receive training on this policy and the risk that our company faces from modern slavery in its supply chains as part of the employee onboarding process. Updates will be issued using the established channels of communication between the business and you. All of our suppliers, contractors, and business partners must be made aware of our zero-tolerance policy towards modern slavery at the outset of our business relationship with them, and complying with our modern slavery policy as necessary going forward with our partnership.

### **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

### **Final Provisions**

If you have any questions or concerns in regard to this policy, please don't hesitate to contact our Compliance Officer.

This policy shall be reviewed annually, and no later than 12 months from the date it has been adopted on.

**Name:**

**Position:**

**Date:**

**Signature:**

**Review date:**