

DOCUMENT ID: BMS009 | **DOCUMENT TITLE:** Modern Slavery and Trafficking Policy

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APPROVED BY: Norman Smith, Director | **DATE APPROVED:** 01/09/2022

Slavery & Human Trafficking Statement Policy

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2019. It covers all Invicta Environmental Ltd Business and its supply chain.

Our Policy on Slavery & Human Trafficking

Our anti-slavery policy reflects our aim to act transparently, respectfully and with integrity in all our business relationships. We do not tolerate slavery or human trafficking in any part of our business and are committed to ensuring that it does not take place in our supply chains. We implement and enforce effective systems and controls to mitigate this risk.

Our Supply Chains

We have reviewed our purchases to understand the nature of our suppliers. These include product supply and subcontractors who provide a range of goods and services to help us deliver our business aims and objectives.

Risk Assessment And Due Diligence Processes For Slavery And Human Trafficking

We have in place systems to mitigate the risk of slavery and human trafficking occurring in our supply chains, allowing us to assess, identify, address and monitor risk areas. We assess the risk of slavery or human trafficking occurring in our supply chains and apply enhanced checks should higher-risk areas be identified. We actively try to use Invicta employees for works to ensure compliance with this policy.

Existing Supply Chain

As part of our risk management process, we asked suppliers and sub-contractors to carry out a risk assessment to consider any existing or future arrangements with third parties.

This included identification of:

- All businesses they use to provide staff or services, where there is a heightened risk of poor practice, particularly where they employ non-UK nationals or considering the services the staff are asked to provide.



- Suppliers whose work involves a high level of physical labour; and
- Relationships involving suppliers operating outside the UK, in countries where controls on employment practices may be weaker.

We assessed the responses and identified risk areas so that we could review those relationships in more detail. This process is checked on a yearly basis.

Future Suppliers

We will carry out risk assessments for new suppliers to consider the likelihood of maltreatment of staff or other unsatisfactory factors. This may mean that we decide not to work with them or seek further information, or assurances, before proceeding. For new suppliers where a higher risk is identified:

- If the supplier is required to comply with the Modern Slavery Act 2015, we will review their own published policies on modern slavery.
- For other suppliers, we will seek declarations that they meet appropriate requirements and may ask them to give information on their working practices.
- We will apply appropriate vetting procedures, based on the level of risk identified, to ensure we are comfortable that any risks involving slavery can be identified and addressed promptly.

Supplier Adherence To Our Policy

To ensure all those in our supply chain and contractors comply with our policy, we have in place a supply chain compliance programme. This consists of contractual warranties in our agreements with suppliers, site visits (where deemed appropriate and practically possible) and regular audits to check compliance with our policies and procedures.

Raising Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide updates to our staff via our internal newsletters/briefings and by providing both written and oral reminders of good practice.

This statement covers all Invicta Environmental Business.

Responsibilities:

The Managing Director is responsible for:

- Reviewing, endorsing and achieving this policy's aims.

The Directors are responsible for:

- Ensuring that this policy and supporting strategies and procedures are distributed, implemented and complied with
- Ensuring that their businesses operate to the requirements set out in the Invicta business management system
- Leading by example in protecting and championing knowledge sharing across the business

Managers are responsible for:

- Implementing and enforcing the processes and procedures
- Ensuring that their people are aware of their responsibilities and receive appropriate training; and
- Addressing any inappropriate behaviour.

Employees are responsible for:

- Carrying out their work in line with this policy and associated procedures
- Challenging any behaviour that falls short of the expectations of this policy; and
- Identifying any breaches of this policy and reporting them to their line manager.

What will successful implementation of this policy achieve?

- Continually improving quantitative and qualitative data trends
- Reporting HS&E data to senior management
- Recognition by external bodies in the form of awards, nominations and certifications; and
- Improved benchmarking results when examining our performance against our peers or when audited by independent external bodies.

Signed

Norman Smith



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