

Introduction

Nviro is committed to looking after its people to ensure that they have a safe and healthy working environment free from exploitation, in which they can thrive, and we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. As such Nviro takes a zero-tolerance approach to modern slavery in all forms, including in our supply chain. The health, safety and well-being of our staff is top of our priority and critical to the Company's success: we look after our people, so they look after our customers.

Responsibilities

Nviro holds regular reviews of our internal process in relation to our workforce and those of our supply chain; responsibility for the Company's anti-slavery initiatives are as follows:

- Policies are put in place by the head/manager of the relevant department and reviewed annually by them and the Board of Directors.
- The Nviro Executive Committee meets quarterly with Senior Managers and makes them aware of any new policies or changes made to current policies, including the risks involved in our supply chain regarding modern slavery.
- Nviro's HR department leads any investigations relating to reports of known or suspected instances of modern slavery.
- Nviro's Asset and Supplier Manager is responsible for the development of the Company's partnership with our suppliers and the provision of risk assessments. In collaboration with our HR department, they measure the possible risks to eliminate modern slavery activities from our supply chains.
- The Head of Learning and Development, along with the Head of Human resources is responsible for writing and rolling out Mandatory Modern Slavery and Human Trafficking training with all Support staff and all Newly recruited support colleagues as part of the induction process. The training is carried out on an internal electronic platform (Nviro Academy,) and refreshed annually.

Training

The first step in reducing the risk to our workforce is the education of all our support colleagues to look out for the signs that an individual may be at risk.

Nviro requires all support staff to complete training on modern slavery as a module within the Company's wider training programme. Nviro's modern slavery training covers:

- What modern slavery and human trafficking is
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the HR Department

Policies and Internal Procedures

Nviro has various policies and codes of conduct in place that address the possible modern slavery risks in our supply chain:

Nviro Limited Board Approved. Policy last reviewed October 2022 (reviewed on an annual basis).

- **Whistleblowing Policy** - Nviro encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Recruitment Policy** - We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.
- **Safeguarding Policy** –The company is committed to working with our clients to ensure our employees safeguard and promote the welfare of children and vulnerable adults in the workplace
- **Employee Code of Conduct** - Nviro's code makes clear to colleagues the actions and behaviour expected of them when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour.
- **Supplier terms and conditions** - Nviro is committed to ensuring that suppliers adhere to the highest standards of ethics. Before we agree to work with suppliers, they are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the Nviro Supplier terms and conditions will lead to the termination of the business relationship.
- **Payroll procedures** - Nviro require all our colleagues to provide proof of bank account to their line manager to establish that their bank account belongs to them and nobody else.

Due Diligence of Suppliers

Nviro undertakes due diligence when considering new suppliers, and regularly reviews its existing suppliers. In order to become an Approved Supplier, all candidates must undergo our New Supplier approval process which forms part of our Quality Management System and accreditation. To complete the verification process, all supplier applications are reviewed by a Company Director to ensure compliance with practices and suitability to Nviro and its customers.

The Company's due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new supplier
- Acceptance by our suppliers that they will verify workers ages and take reasonable steps to prevent child labour being used in their supply chain
- Reviewing on a regular basis all aspects of the supply chain
- Conducting supplier audits, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Applying sanctions against suppliers that fail to improve their performance in line with an agreed action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Signed by Director: 