

Introduction

Nviro is committed to looking after our colleagues 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.

Responsibilities

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

- The People Director is accountable for ensuring ethical labour standards are applied and protecting the human rights of all colleagues working for Nviro.
- The Executive Leadership Team is responsible for reviewing policies on an annual basis.
- Nviro's HR department leads on investigations relating to reports of known or suspected instances of modern slavery.
- Nviro's Asset and Supplier Manager is responsible for the development of Nviro'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 HR is responsible for writing and rolling out Mandatory Modern Slavery and Human Trafficking training with all existing colleagues and all newly recruited colleagues. The training is carried out on an internal electronic platform (Talent LMS) for support colleagues and is refreshed annually. For cleaning colleagues, the training is delivered via a toolbox talk.

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 colleagues 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. All policies and procedures are reviewed on annual basis to ensure continuous improvement:

- **Whistleblowing Policy** - Nviro encourages all its colleagues, customers and other business partners to report any concerns related to the direct activities, or the supply chains, of the business. 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.

Nviro Limited Board Approved. Policy last reviewed October 2023 (reviewed on an annual basis).

- **Recruitment Policy** – Nviro has robust recruitment processes in place. Where employment agencies are required, Nviro will use only specified, reputable employment agencies to source labour and will always verify the practices of any new agency before accepting workers from that agency.
- **Safeguarding Policy** – Nviro is committed to working with our clients to ensure our colleagues safeguard and promote the welfare of children and vulnerable adults in the workplace.
- **Colleague 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 colleague 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 requires 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. Close monitoring of colleague bank details and regular checks on home addresses are carried out to ensure that multiple use of the same bank account or address is legitimate and not of any concern. The Recommend a Friend scheme is closely monitored by the Payroll department to ensure that introducing significant numbers of colleagues is legitimate and of no concern.

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.

Nviro'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.