

ANTI SLAVERY POLICY

This policy sets out the general rules and principles to which we adhere to discharge Envirovue obligations with respect to the Modern Slavery Act 2015. It will be communicated to all businesses and employees overseen by the group main board, as well as relevant business partners and other necessary individuals and entities. Those who work in areas within our business, where it has been identified that there may be the risk or possibility of slavery and human trafficking, will receive additional training and support in identifying and preventing slavery and trafficking within Envirovue supply chain.

This policy explains the procedures through which Envirovue can maintain its high ethical standards and protect its reputation against any allegations which could lead to a breach of the Modern Slavery Act 2015. Its successful implementation requires pro- active adoption at the following levels:

You – as an employee of Envirovue, you are required to read and understand all aspects of this policy, and abide by it.

Local Management – Each business units overall compliance with the requirements of this policy is the responsibility of the Director nominated by the Board and Envirovue Compliance Officer, subject to approval by them will ensure the various business units adherence to sections [5, 6, 7 and 8] of this policy.

Business Unit Managers – are responsible for the compliance of business units within their control.

Asprey St John & CO LTD Trading as Envirovue will assist each business unit with continuous refreshing and reinforcing of this policy via application guidance and monitoring and at the appropriate time publishing an annual “slavery and human trafficking statement”, each financial year, setting out the steps that Envirovue have taken to ensure that Envirovue and their supply chains are free from modern slavery.



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INTRODUCTION

It is Envirovue's policy to conduct business in an ethical way, and without the use of practices or acts that would be in breach of the requirements of the Modern Slavery Act 2015 to obtain an unfair advantage or benefit

Envirovue is committed to ensuring adherence to the highest legal and ethical standards. This must be reflected in every aspect of the way in which we operate. We must bring integrity to all our dealings. Modern Slavery harms, degrades or exploits an individual's basic human rights and corrupts those societies or organisations in which these acts are committed.

This is not just a cultural commitment on the part of the company it is a moral issue and a legal requirement governed in the UK by the Modern Slavery Act 2015 whereby, failure to produce a 'slavery and human trafficking statement' for a particular financial year, the Secretary of State may seek an injunction through the High Court (or, in Scotland civil proceedings for specific performance of a statutory duty under section 45 of the Court of Session Act 1988) requiring the organisation to comply. If the organisation fails to comply with the injunction, they will be in contempt of a court order, which is punishable by an unlimited fine, as well as endangering the Company's reputation.

This policy has been adopted by the Board and is to be communicated to everyone involved in our business to ensure their commitment to it. The Board attaches the utmost importance to this policy and will apply a "zero tolerance" approach to acts of Modern Slavery and human trafficking condoned by either our employees or by any business partners working on our behalf or our competitors or clients. Any breach of this policy will be regarded as a serious matter by the Company and is likely to result in disciplinary action or immediate termination of contracts in respect of our suppliers if, after investigation, they are found to be at fault and further the Company will report those individuals or organisations suspected of carrying out such acts to the relevant authorities.

WHAT IS MODERN SLAVERY?

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist. Someone is in slavery if they are:-

- Forced to work – through mental or physical threat;
- Owned or controlled by an 'employer', usually through mental or physical abuse, or the threat of abuse;
- Dehumanised, treated as a commodity or bought or sold as a 'property';
- Physically constrained or has restrictions placed upon the individual's freedom of movement



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The Act sets out offences of slavery/servitude, forced/compulsory labor and human trafficking. The offence of slavery or forced labor is committed where a person holds another person in slavery – or requires them to perform forced labor and, in each case, the circumstances are such that the person knows or ought to know that the other person is held in slavery or is required to perform forced labor. The offence of human trafficking is committed where a person arranges or facilitates the travel of another person (whether that person consents to such travel and irrespective whether they are an adult or a child) with a view to that person being exploited.

WHAT ARE THE REQUIREMENTS OF THE MODERN SLAVERY ACT 2015?

For commercial organisations like Envirovue, Envirovue is required to publish a slavery and human trafficking statement, which must be published each financial year, setting out what steps Envirovue has taken to ensure that its business and supply chains are free of modern slavery. The statement must be published on the organisation's website, together with a link to it in a 'prominent place' on the home page and Envirovue have taken steps to ensure that this will be the case and Envirovue statement will be published annually upon the Envirovue web site - www.Envirovue.com/. Additionally, Envirovue are committed to provide a copy of the statement within 30 days of receipt of a written request for one.

The Act provides high-level statutory guidance on the contents of the statement, but does not otherwise require affected organisations, such as Envirovue, to take any particular action or to meet any particular standard. However, the statement must be approved at the highest level within the organisation, which, in the case of Envirovue, means that Envirovue statement will be approved by the Board and signed by a Director to show that the required disclosure has been made and to continue Envirovue adherence to the highest legal and ethical standards.

If an organisation captured by the provisions of the Act, fails to produce a slavery and human trafficking statement for a particular financial year the Secretary of State may seek an injunction through the High Court (or, in Scotland civil proceedings for specific performance of a statutory duty under section 45 of the Court of Session Act 1988) requiring the organisation to comply. If the organisation fails to comply with the injunction, they will be in contempt of a court order, which is punishable by an unlimited fine.

WHO IS AFFECTED BY THE ACT?

Commercial organisations (bodies corporate and partnerships and wherever incorporated or formed) that carry on a business or part of a business in the UK supplying goods or services and have an annual turnover (including that of its subsidiary undertakings) of at least £36 million will have to publish an annual slavery and human trafficking statement. There is no requirement for organisations to have a certain level of activity in the UK before the Act applies.



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Smaller organisations that do not satisfy the turnover threshold are not required to publish a statement, but may also be affected. This will be the case where they form a part of the supply chain of a larger organisation that is required to publish a statement and who are therefore likely to scrutinise afresh their business and supply chain by, for example, conducting additional and on-going due diligence and/or seeking specific assurances from its supply chain.

Envirovue will undertake and maintain the necessary compliance with respect to its supply chain and will accordingly seek those specific assurances from its supply chain.

WHEN WILL PROVISIONS OF THE ACT APPLY?

The supply chain transparency provisions of the Modern Slavery Act 2015 came into effect on the 29th October 2015 and those organisations that are affected will have to prepare for the disclosure obligations of the Act and in particular those with a year end of the 31st March 2016.

Envirovue next applicable financial year end, is the 31st January 2017, after which point in time, Envirovue will meet its obligation with respect to its 'slavery and human trafficking statement' and at each and every subsequent financial year end.

WHAT STEPS CAN WE TAKE TO PREVENT MODERN SLAVERY?

Envirovue are undertaking the following steps to assist in the prevention of Modern Slavery:

- A. Risk Assessment

Effective risk assessment lies at the very core of the success or failure of this policy. Risk identification pinpoints the specific areas in which we face Modern Slavery risks and allows Envirovue to better evaluate and mitigate these risks and thereby protect ourselves. – Any of which can vary. Local Management must assess the vulnerability of each business unit to these risks within the supply chain, on an ongoing basis, subject to review by Envirovue nominated Director on the Board, together with the Officer designated within Envirovue to be responsible for compliance.

N.B. risk assessment is intended to be an ongoing process with continuous communication between Local Management and the Company's designated Compliance Officer.

- B. Effective Monitoring and Internal Control

Our business units must all maintain an effective system of internal control and monitoring of our transactions. Once Modern Slavery risks have been identified and highlighted via the risk assessment process, procedures can be developed and maintained, within comprehensive control and monitoring programmes in order to help mitigate these risks on an ongoing basis.



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The Officer responsible for compliance, must ensure that Local Management engages in effective risk assessment and implements the necessary steps to prevent Modern Slavery in Envirovue supply chain. The Director designated by the Board will consult with the Company's designated Compliance Officer, who will make available guidelines, principles and methodologies for the identification, mitigation and monitoring of these risks and the preparation of Envirovue 'slavery and human trafficking statement'

In this respect guidance has been published by the UK Home Office entitled 'Statutory guidance relating to Section 54 of the Modern Slavery Act 2015' – 'Transparency in supply chains: a practical guide'

Where Do Modern Slavery Risks Typically Arise?

Modern Slavery risks typically fall within the following categories:

Use of Business Partners

The definition of a business partner is broad, and could include for example, any supplier or sub-contractors, consultants or employment agencies, in Envirovue supply chain, who act on behalf of Envirovue. Whilst the use of business partners can help us reach our goals, we need to be aware that these arrangements can potentially present Envirovue with significant risks.

Risk can be identified where a business partner conducts activities on Envirovue behalf, so that the result of their actions can be seen as benefiting Envirovue.

Business partners or any other party who act on Envirovue behalf in a supply chain capacity, must be advised of the existence of and operate at all times in accordance with this policy.

Local Management is responsible for the evaluation of each relationship and determining whether or not it falls into this category.

Where risk regarding a business partner arrangement has been identified, Local Management – in conjunction with the guidance issued by the UK Home Office - 'Transparency in supply chains: a practical guide' – must:

- Understand the services to be provided, and methods of how that service will be delivered to Envirovue, particularly with regards to the labor used by the business partner to deliver that service and what policies the business partner has in place to ensure prevention of Modern Slavery and compliance with the Modern Slavery Act 2015.
- Take reasonable steps to monitor the transactions and operations of business partners appropriately
- Ensure there is a written agreement in place which acknowledges the business partners understanding and compliance with this policy



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Envirovue is ultimately responsible for ensuring that staff and business partners who act on our behalf are compliant with this policy as well as operating in accord with that required by Law. Ignorance or “turning a blind eye” is not an excuse. As the business partner evaluation process will vary by business unit and type of business partner, Local Management should consult in the first instance with Envirovue Compliance Department, if there are any doubts or suspicions that a business partner is not operating in compliance with this policy.

LOCAL ADAPTATION

In order for this policy to be effective, it is necessary for it to be applied on a mandatory basis throughout Envirovue and cascaded and embedded into the Envirovue supply chain. Therefore, all procurement processes, supply contracts and terms and conditions will reinforce this policy and message and the necessary warranties/declarations, obtained, confirming that our business partners will adhere to this policy.

HOW TO RAISE A CONCERN - 'WHISTLEBLOWING'

As individuals who work on behalf of Envirovue, we all have a responsibility to help detect, prevent and report instances not only of Modern Slavery, but also of any other suspicious activity or wrongdoing. Envirovue is absolutely committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any suspicious activity. We want each and every one to know how they can “speak up”.

If you have a concern regarding a suspected instance or instances of Modern Slavery within Envirovue supply chain, or in respect of any of Envirovue business partners, please speak up – your information and assistance can only help. The sooner you act the better for you and for Envirovue. To help, we have created multiple channels to allow you to do this.

If you are concerned that an act of some kind related to Modern Slavery is being considered or carried out – either within Envirovue, by any of our business partners or by any of our competitors or clients – you must report the issue/concern to your Line Manager and to Envirovue Compliance Officer. If for some reason it is not possible to speak to your Line Manager, please then report it to another Senior Manager, Envirovue Company Secretary, or to the Compliance Department.

If you are not comfortable with speaking directly to a colleague or anyone mentioned above, Envirovue has introduced an online reporting facility accessed at info@envirovue.com for all employees and relevant business partners to use. The online facility has the capacity to handle anonymous complaints and has restricted access, limited to the Company’s Compliance Officer.



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In the event that an incident of Modern Slavery, or wrongdoing is reported, we will act as soon as possible to evaluate the situation. Envirovue has clearly defined procedures for investigating such misconduct and non-compliance issues and these will be followed in any investigation of this kind. If you have any questions about these procedures, please contact the Company's Compliance Officer.

CONCLUSION AND CERTIFICATION

It is the ultimate responsibility of the Board routinely to refresh and reinforce this policy and its underlying principles and guidelines. Local Management, under the overview of Envirovue Compliance Director, are responsible for the establishment and ongoing monitoring of compliance with sections [5, 6, 7 and 8] of this policy. All Envirovue business unit employees and relevant business partners are responsible for annual certification as to the receipt and understanding of this policy as part of our annual compliance training and supply chain management procedure.

Signed



Date: 01/02/2021

Alex Trenbath
Director



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