



Modern Slavery

2.1. Introduction

We are 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 international slavery law and conventions e.g. the Modern Slavery Act 2015 (UK). We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we 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.

The business is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

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

This statement sets out The Company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

2.2. Company structure and supply chains

The Company provides full Incinerator Bottom Ash (IBA) processing solutions to Energy from Waste facilities. The IBA is processed into metal or aggregate products. We have employees, sub-contractors, agents, business partners and trade suppliers, whom are typically working with the Company under short or long term contracts.

2.3. Countries of operation and supply

The Company operates globally and supply chain extends to different regions worldwide (e.g. Europe, USA, Asia).

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

2.3.1. Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Risk assessments:** Make assessment of suppliers and customers of their business from publicly available data to satisfy ourselves as much as possible with such limited information that people in our supply chain are not exploiting people.

2.3.2. Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** the business encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply



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chains of, the business. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The business's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact their line manager or a director of the company.

- **Employee code of conduct** the business's code makes clear to employees the actions and behaviour expected of them when representing the business. The business strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Child labour:** Child labour is a violation of fundamental human rights and has been shown to hinder children's development, potentially leading to lifelong physical or psychological damage. More information can be found at the International Labour Organisation².

The Worst Forms of Child Labour Convention, 1999 (No. 182) has been ratified and defined the age of child labour. This fundamental convention defines as a "child" a person under 18 years of age. It requires ratifying states to eliminate the worst forms of child labour, including all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict; child prostitution and pornography; using children for illicit activities, in particular for the production and trafficking of drugs; and work which is likely to harm the health, safety or morals of children. The convention requires ratifying states to provide the necessary and appropriate direct assistance for the removal of children from the worst forms of child labour and for their rehabilitation and social integration. It also requires states to ensure access to free basic education and, wherever possible and appropriate, vocational training for children removed from the worst forms of child labour.

- **Recruitment policy** the business uses only reputable sources, including employment agencies local newspapers and Social Media Sites, to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

2.3.3. Due diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- construction of the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;

2.3.4. Communication and awareness of this policy

The Company has raised awareness of modern slavery issues through various methods, including Toolbox Talks, covering the following;

- the basic principles of the Modern Slavery Act 2015 (UK), the EU Convention on Human Rights 1950 (EU), ILO Forced Labour Convention 1930 (International), the Modern Slavery Act 2018 (Australia), 13th Amendment of the Abolition of Slavery Law 1865 (US);
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the company.

² International Labour Standards on Child labour | International Labour Organization (ilo.org)



2.3.5. Breaches of the policy

We may terminate our relationship with other individuals and Companies working on our behalf if they breach this policy.

If you have any queries or complaints about our Modern Slavery Policy, please contact us at:

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