

Scope

This document establishes the Modern Slavery Policy & Procedure for ‘the Company’ and ‘Company’ refer to the legal entities, Emico Ltd, their subsidiaries or group services. References in this policy to ‘our people’ are to employees of Emico Ltd across the Group.

Purpose

Emico Ltd recognises that slavery and human trafficking are significant human rights issues and are committed to taking the required steps to mitigate the risk of these occurring within our business and our supply chain.

Emico Ltd has a zero-tolerance approach to any form of modern slavery, human trafficking or human rights abuse. We are committed to acting ethically, with integrity and transparency in all our business dealings and implementing effective systems and controls to safeguard against any form of human rights abuse taking place within our business or supply chain.

The Emico Ltd Modern Slavery Policy & Procedure will be brought to the attention of all our people. This Policy does not form part of our people’s contract of employment and may be amended by the Company.

The policy is also available on our Company website and EPDS and will be reviewed annually to ensure it is fit for purpose.

Introduction

The UK Government enacted the Modern Slavery Act 2015 to better tackle the crimes of modern slavery and human trafficking, in all their forms. As well as consolidating the criminal offences relating to modern slavery and human trafficking, the Act also introduced a requirement for businesses to publish an annual statement setting out the steps taken by the business to ensure that modern slavery and human trafficking are not taking place in the business or supply chains. This is section 54 of the Act.

As an independent contracting business operating within the UK, we recognise that the groups of people who could potentially be affected by slavery, human trafficking or rights abuse issues are our directly employed workforce; agency workers and Personal Service Companies carrying out work on our behalf; subcontract staff working on our projects and the workforce of our supply chain who supply materials to our business.

Emico's Modern Slavery Policy has been devised in line with the Universal Declaration of Human Rights, the conventions of the International Labour Organisation (ILO) and the UN's Guiding Principles on Business and Human Rights.

Application

Emico Ltd has policies and procedures in place to ensure that we are conducting business in an ethical and transparent manner. The steps that we take to mitigate risks in relation to each of these areas are below.

Permanently Employed Workforce

- We verify that all permanent employees have the right to work in the UK. Please refer to the Company's Recruitment & Onboarding Procedure.
- We make all employees aware of their working hours, pay entitlements, annual leave / absence entitlements and other employment benefits via their Terms & Conditions of Employment.
- We prohibit the use of forced labour and provide training on modern slavery to all employees. Modern Slavery Awareness training is provided during the induction process and refresher training sessions are organised for existing staff. Our E-Learning platform is utilised for this.

Agency Workers

- We engage agency workers who are provided by our vetted labour partners on the Emico Ltd Agency PSL (Preferred Supplier List)
- A Service Level Agreement (SLA) is reviewed and signed where Emico Ltd require all our labour partners to:
 - Confirm that their agency workers have the right to work in the UK.
 - Confirm they do not charge their workers a work finding fee and that they pay at least the real living wage.
 - Have procedures in place which mitigate the risk of recruiting forced or compulsory labour.

Personal Service Companies

- We engage Personal Service Companies either directly or through our vetted labour partners on the Emico Ltd Agency PSL (Preferred Supplier List).
- Those engaged directly with Emico must sign a Professional Services Agreement which confirms:
 - That they have the right to work in the UK.
 - That they do not charge their workers a work finding fee if they have others engaged through their Personal Service Company and that they pay at least the real living wage.
- The above also applies to any Personal Service Companies engaged through our vetted labour partners.

Subcontractors

- We require subcontractors to provide evidence that they verify their employees have the right to work in the UK.
- We consider the subcontractors approach to employee rights and any breaches of human rights related legislation during our selection process.
- We ask for them to confirm that they pay at least the living wage.
- We ask all site-based operatives to provide evidence of the necessary cards to attend work on a project i.e., ECS or CSCS.
- We require all subcontractors who purchase materials for use on our sites to consider the risk of modern slavery in their supply chain.

Child Labour

We require all our suppliers to adhere to the standards set out by the International Labour Organisation with regards to the employment of children and young people. In particular:

- Children must not be recruited before they have reached the age of completion of compulsory schooling, and in any case not before the age of 16 (Note: an individual can leave school on the last Friday in June if they are 16 before the end of summer holidays); and those under 18 must not be required to perform hazardous duties. Until the age of 18 in the UK the school leaver must be in full time education, an apprenticeship or spend 20 hours or more working or volunteering while in part-time education or training.
- A young person's risk assessment must also be completed for those under 18 years of age.

Supply Chain

- We procure many of our directly sourced materials from UK based organisations that are required to comply with UK law in respect of forced labour.
- Where materials are directly sourced from outside of the UK, we consider the risk of slavery and human trafficking as part of our selection process. Those suppliers are vetted accordingly.
- We have carried out a supply chain mapping exercise which assesses the risk of human rights abuse in countries where our goods may be supplied from. More detail is captured in Emico's Sustainable Procurement and Ethical Purchasing Policy.
- We ask them to confirm that they pay at least the living wage to their workers.

Due diligence through the onboarding processes is undertaken on all the above areas prior to allowing them to operate within the Company or supply materials.

Spotting The Signs

Signs that someone might be a victim of modern slavery include:

- Physical appearance has signs of injury, abuse, and malnourishment
- Physical appearance looks unkempt, often in the same clothing and have poor hygiene
- Be under the control and influence of others
- Live in cramped, dirty, overcrowded accommodation
- Have no access or control of their passport or identity documents
- Appear scared, avoid eye contact, and be untrusting
- Be collected very early and / or returned late at night on a regular basis
- May have inappropriate clothing for the work they are performing, and / or a lack of safety equipment
- May be isolated from the local community and their family.

It can include victims that have been brought from overseas, and vulnerable people in the UK, being forced to illegally work against their will in many different sectors, including brothels, nail bars, factories, construction, hospitality, car washes and agriculture.

The above signs are captured in the Modern Slavery Awareness training that is provided to workers through our E-Learning platform.

Measuring Effectiveness

To monitor the effectiveness of the steps we have taken to stop slavery and trafficking taking place in our business and supply chains, we will use the following performance indicators:

- All workers will have completed the Modern Slavery Awareness training, as referenced above.
- We have issued our Modern Slavery Policy & Procedure to our workforce through our induction process and EPDS. It is also available on our Company website. This shows we clearly communicate our stance in relation to modern slavery.
- We will establish a process to gain a better oversight of our direct supply chain and consider how best to risk assess, carry out due diligence and communicate with these suppliers in relation to modern slavery issues. We will consider whether it is appropriate to raise specific questions in relation to slavery and trafficking with these suppliers.
- As we develop our risk assessment and due diligence processes, we will assess and consider the appropriateness of developing further measures, where we assess that there may be a heightened risk of slavery and trafficking within those organisations. We will take appropriate measures to encourage and persuade them to adopt their own measures to minimise the risks of slavery and trafficking within their own organisations and the supply chain beyond.
- Emico will carry out audits of supply chain partners to monitor and assess the risks of modern slavery. These audits will be documented and retained for future reference.

Raising Concerns & Handling Breaches

All individuals, regardless of employment status, can utilise the Emico Whistleblowing Policy & Procedure to confidentially raise issues or concerns in respect of any aspect of ethics or compliance, including slavery and / or human trafficking.

If a concern is raised on Modern Slavery (whether openly or anonymously), Emico will investigate this, and anyone found in breach of actions that contravene our Modern Slavery Policy or the Modern Slavery Act 2015 will invoke the Disciplinary Procedure for employees. Should this be a supply chain member / labour partner, Emico will share its investigation findings with the relevant company to respond and carry out their disciplinary process, where applicable. The findings may result in a suspension or the ceasing of a relationship / engagement.

Should you have any questions, please do not hesitate to contact the Managing Director or HR.

Signed:



Name: David Perrotton

Job title: Managing Director

Date: June 2025