

# Modern Slavery and Human Trafficking Statement

## INTRODUCTION

This statement sets out EverythingManaged Group actions to understand all potential modern slavery risks related to the Group and its operating businesses and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within the Group and our supply chains. This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.

EverythingManaged Group recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Although we do not meet the requirement threshold of turnover (£36 million), the Group is absolutely committed to preventing slavery and human trafficking in all its activities and ensures that its supply chains are free from slavery and human trafficking.

## ORGANISATIONAL STRUCTURE & SUPPLY CHAINS

This statement covers the activities of EverythingManaged Group.

The Group is privately owned and offers businesses waste services and payments processing. Our waste supply chain is based in the UK and provides waste collection services.

## COUNTRIES OF OPERATION

The organisation currently operates in the United Kingdom.

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

- A review of our supply chain partners including their country source of labour in support of our business operations. As we are operating exclusively in the UK with all of our supply chain partners also based in the UK, we consider the overall risk of slavery and/or human trafficking to be very low.
- For all employees, we carry out Right to Work in the UK checks and pay minimum wages or above in accordance with published UK government legal guidelines in respect of National Minimum and National Living Wage.

## RISK ACTIVITIES

As part of our supply chain evaluation process, we conduct risk assessments of our supply chain activities across the Group. On an ongoing basis we review the response of our supply chain evaluation process, to ensure that there is minimal risk of occurrence.

We run a vigorous supply chain process, which includes compliance checks, to ensure our partners meet or exceed our modern slavery and human trafficking policy requirements.

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## RESPONSIBILITY

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

- **Policies:** Procurement Director
- **Risk Assessments:** Procurement Director supported by the Head of Compliance will assess the risk of slavery or human trafficking within the supply chain.
- **Investigations/due diligence:** The Head of Compliance is responsible for carrying out investigations supported by the Procurement Director. The Procurement Manager is responsible for ensuring the Company's policies are communicated to the supply chain partners and form part of the supplier assessment process.

## RELEVANT POLICIES AND PRACTICES

The organisation operates the following policies and practices 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:

- **Ethical business code of conduct policy:** The Group's code makes clear to employees the actions and behaviours expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.

The Group is committed to ensuring that its supply chain partners adhere to the highest standards of ethics. Partners are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with the supply chain to ensure that they meet the standards of the code. Serious violations of the organisation's code of conduct will lead to the termination of the business relationship.

As part of our supply chain evaluation, candidates are asked if they have a policy/statement that sets out the steps their organisation takes to ensure that slavery and human trafficking are not taking place in any of their supply chains or in any part of their own business. If any potential supply chain partner is unable to demonstrate that they have a robust policy in place, we ensure that they agree to act in accordance with our policy.

## DUE DILIGENCE

The organisation undertakes due diligence when considering taking on supply chain partners, and regularly reviews its existing partners. The organisation's due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new partner.
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where material risks are identified.

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- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action appropriately.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or which seriously violate our supplier code of conduct, including the termination of the business relationship.

## BOARD APPROVAL

This statement has been approved by the organisation's Operational Board who will review and update it at least annually.

Damon Smith



Chief Executive Officer

*Dated: April 2023*