



**MODERN
SLAVERY &
HUMAN
TRAFFICKING
POLICY
STATEMENT**





1 MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

EMR is a global leader in the provision of sustainable materials, with physical operations in the UK, USA, Germany and the Netherlands. Our purpose is to create a future where less of the materials we use need to be extracted from the planet.

Each year EMR recycles around **10 million tonnes of material** in its mission to extend the life cycle of materials. This saves over **15 million tonnes** of Co₂ from entering the Earth's atmosphere, which is more than the emissions of the city of Rome.

2 OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Code of Conduct reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls. We continue to improve our practices and have implemented training and procedures to combat modern slavery and human trafficking.

We have systems in place to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains.

Our Code of Conduct requires all colleagues to:

- Always follow company procedures when working with external parties;
- Only work with companies on our approved customer and supplier lists;
- Speak up immediately about any issues or concerns.





3 MANAGEMENT OF KEY RISKS

We have zero tolerance to slavery and human trafficking and expect all of our suppliers to adopt the same approach. Following a review of risk areas in relation to modern slavery and human trafficking, we concluded that these fall broadly into the following categories:

- Employment of temporary colleagues recruited through agencies;
- Suppliers of logistics and transport services to the business;
- Suppliers of other services, equipment and consumables to the business;
- Our supply customer base;
- Our sales customer base.

In 2023 we introduced a new value chain risk assessment process, focused on the risk of negative social and environmental impacts, including modern slavery, in our customer base and whether we have appropriate controls measures in place.

We manage these risks using the following measures:

- Before entering into a business relationship with new counterparties we undertake a legal and regulatory compliance check of the counterparty using a recognised external screening service.
- Before entering into a business relationship, new suppliers of services, equipment and consumables are screened on a risk-assessed basis for compliance on modern slavery and human trafficking issues.
- We operate a preferred suppliers list of employment agencies. This is a managed service provided by a national agency with robust processes in place to manage suppliers at risk of modern slavery and human trafficking.
- Our management training on modern slavery and human trafficking is undertaken by anyone within EMR who visits customer or supplier sites and anyone who enters into business relationships with counterparties.

- We continue to raise awareness amongst EMR colleagues and other people with cause to visit our sites (service providers, drivers and supply customers) highlighting the risk of modern slavery and human trafficking and encouraging them to speak up and report any concerns. Our speak up service is operated by NAVEX, an independent specialist third party provider.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes EMR's modern slavery and human trafficking statement.

This policy will be displayed in every depot, communicated to everyone working for or on behalf of EMR and displayed on our website.

This statement is signed by the Group Chief Executive Officer on behalf of the Board and the Executive management Team to demonstrate the commitment of

Christopher Sheppard

Group Chief Executive Officer



For further information please contact ukinfo@emrgroup.com