



MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

EMR is a global leader in sustainable materials, with physical operations in the UK, USA, Germany and the Netherlands. Our core business is the recycling of metal and plastics from a range of public, commercial and industrial waste streams. Sources include end-of-life vehicles, end-of-life white goods, industry, construction and demolition. Our recycling activities generate around 10 million tonnes of sustainable metals and plastics a year, saving over 10 million tonnes of CO₂ compared to using virgin alternatives.

Our policies on modern 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 in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- monitor potential risk areas in our supply chains.

Our Code of Conduct requires all employees 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.



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 the areas of the business at risk in relation to modern slavery and human trafficking, we concluded that these fell broadly into the following categories:

- employment of temporary staff 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.

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 able to provide us with agency staff. 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.
- We have a training programme for managers on modern slavery and human trafficking provided by Thomson Reuters. This training programme is being rolled out to anyone within EMR who visits customer or supplier sites and anyone who enters into business relationships with counterparties. It is anticipated that the programme will be complete by the end of 2021 and new managers will complete the course as part of their induction training.
- We have designed an awareness campaign which will be visible to all 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. This programme will be complete by the end of 2021. The speak up service will be operated by an independent third party.

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- We are introducing an approved contractor scheme as part of our preferred supplier programme. This will apply to all suppliers of regular or significant services, and they will not be able to work on an EMR site unless they have a valid card, demonstrating up to date compliance with required standards and training. It is expected that this programme will be complete in mid 2022.

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 the Company and to this goal.

A handwritten signature in blue ink, appearing to read 'Chris Sheppard', written in a cursive style.

Chris Sheppard

Group CEO

23 September, 2021

**METAL RECYCLING
REIMAGINED**



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Responsible
Business Network

