

Modern Slavery Statement 2023

Ecosurety's approach to modern slavery

Ecosurety has a zero-tolerance approach to any form of modern slavery.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery and human trafficking taking place within our business or our supply chain.

Introduction

This is the fourth annual statement on slavery and human trafficking and details the steps taken by Ecosurety to prevent modern slavery in its business for the financial year ending 31st December 2023 and has been published in accordance with the Modern Slavery Act 2015 Section 54.

Due to the nature of our organisation and our direct activities we deem ourselves to have a low risk of modern slavery.

We do however acknowledge that we are indirectly involved in the waste collection and recycling sector. This sector has a high potential risk, in relation to UK modern slavery. Thus, we have a strong focus on this risk within our training, risk management, supplier approval and audit processes.

Ecosurety structure

Ecosurety was established in 2003 and has grown to become the 2nd largest compliance scheme in the UK, employing over 70 people.

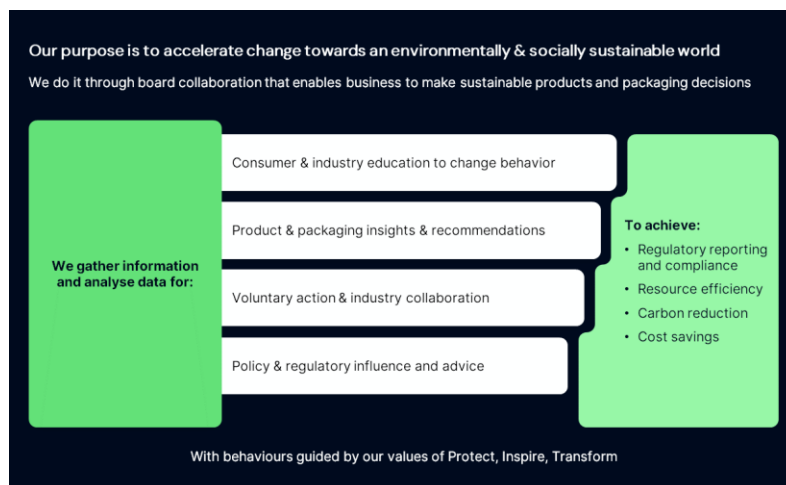
Our purpose is to accelerate change towards an environmentally and socially sustainable world.

Our mission is to deliver data-driven insight, and technical and regulatory expertise, to inform, influence and take action.

Our vision is to collaborate to enabled the move from single-use packaging to lower carbon and more sustainable alternatives

Our customers are packaged consumer goods brands and retailer.

As a B Corp™ certified business, Ecosurety meets the highest verified standards of social and environmental performance, transparency, and accountability – placing people and planet at the same level as profit.



Ecosurety have also been awarded Living Wage Certification in recognition of our commitment to voluntarily take a stand to ensure that our employees, suppliers, and contractors can earn a realistic wage that exceeds the legal minimum.

Ecosurety policies

Ecosurety strives to create high performing teams, within an engaging environment where employees can develop their full potential, free from discrimination or harassment, and in which all decisions are based on merit.

Ecosurety has policies in place setting out values and principles for all employees to adhere to including, but not restricted to:

- Recruitment and Selection
- Equality and Diversity
- Anti-Bribery
- Bullying and Harassment
- Health & Safety
- Environment
- Whistleblowing

Ecosurety employees and external stakeholders are expected to report any concerns related to its direct activities or its supply chains. Our policies are available on request, simply contact us for more information

Ecosurety supply chain

Ecosurety are committed to collaboration across our industry and actively encourage transparency, something which we believe to be the greatest enabler of progress.

Our supply chain includes a wide range of organisations that support our office environment and operations, and compliance activities. The majority of our direct suppliers are based in the UK, although international downstream vendors are utilised for some recyclable materials.

Due diligence processes

Ecosurety have supplier approval and supplier review processes in place, including checks on adherence to Modern Slavery Act when auditing our strategic suppliers.

Ecosurety has a Supplier Code of Conduct in place which all suppliers are expected to adhere to, or to take steps to become compliant.

Risk assessment and management

Ecosurety has an extensive risk review process in place. Where there is high potential risk, this is addressed within monthly board meetings. There were no high-risk suppliers identified during 2023 reviews.

Training

Ecosurety recognises that it is our responsibility to ensure that our employees are aware of the reality of modern slavery around the world. We provide briefings to all employees within our induction process, and during staff updates throughout the year. Annual training via our online platform is mandatory for all procurement team members.

2023 Performance

| Action | Result |
|-----------------------|---|
| Provision of training | <ul style="list-style-type: none">• 100% procurement team members completed the online Modern Slavery Act training in 2023• All new employees received Modern Slavery introduction within their induction training plans |

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|--------------------|--|
| Supplier awareness | <ul style="list-style-type: none"> 85% of our strategic evidence suppliers signed Ecosurety's Code of Conduct |
| Supplier processes | <ul style="list-style-type: none"> We documented our highest risk suppliers and planned reviews for 2023 / 2024 |

Going forward: 2024 Actions

| Objective | Action | 2024 Update |
|-----------------------|---|---|
| Provision of training | <p>All procurement team members to complete annual online Modern Slavery training</p> <p>All new employees will receive basic Modern Slavery information within their induction training plans</p> <p>All employees to receive periodic Modern Slavery training</p> | <p>100% procurement team members have completed the 2024 online Modern Slavery training.</p> <p>Chartered Institute of Procurement training on Ethical and Responsible Sourcing completed by PRN buyer. Learnings from this course to be shared with procurement team</p> <p>100% Modern Slavery training given to new full-time employees during onboarding.</p> <p>Modern slavery training open to all employees carried out in January 2024. Further training planned for H2 2024.</p> |
| Supplier awareness | <p>Supplier Code of Conduct to be updated for 2024.</p> <p>Signed Code of conduct to be received from all suppliers</p> | Planned for H2 2024. |
| Supplier processes | <p>All suppliers to provide Modern Slavery Statement and / or confirm processes they have in place to reduce modern slavery in their supply chain</p> <p>Supplier audits to be carried out: Desktop review – target ~100 suppliers Physical audit – target 15% of suppliers (based on risk)</p> | <p>Desktop audits have been completed on suppliers covering 41% of tonnage bought in 2023</p> <p>66.6% of the suppliers audited have a Modern Slavery Statement in place.</p> <p>Above figures as of 7/6/2024. Audits ongoing.</p> |

Signed and approved on behalf of the board



Will Ghali, Chief Executive Officer
Date: 11 June 2024