



## Anti-Slavery & Human Trafficking Statement 2025

### Introduction

This Anti-Slavery and Human Trafficking Statement (the **Statement**) is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**) and is published on behalf of Enovert Management Limited and its subsidiaries (together **Enovert**). References in this Statement to “we”, “us” or “our” are to Enovert.

This is our Statement for the financial year ending 31 December 2024. This Statement sets out the key steps taken by us to prevent modern slavery and human trafficking occurring in any part of our business or supply chains.

We acknowledge our responsibilities under the Act and are fully committed to identifying, preventing and addressing modern slavery and human trafficking risks. We recognise that modern slavery and human trafficking are grave violations of fundamental human rights. It is our priority to ensure our business is conducted ethically, with integrity and in full respect of human dignity.

### Our Business

Enovert is one of the leading resource and waste management companies in the United Kingdom (the **UK**). We operate various sites across the UK and employ a workforce that spans a range of disciplines. Our services include waste management and solutions, green waste composting, hazardous soil treatment, renewable energy generation and landfill restoration and management. While the risk of modern slavery in our direct operations is considered low, we remain vigilant, particularly in relation to our extended supply chains.

We also comply with applicable legislation relating to employee terms and conditions and health and safety. None of our staff earns less than the living wage and we are not aware of any incidents of modern slavery within our business or supply chains to date.

### Our Policies, Procedures and Compliance

We have policies in place underpinning our commitment to preventing modern slavery and human trafficking, including the following:

- **Whistleblowing Policy** (including access to the *WhistleB* system); and
- **Modern Slavery Policy**.

These policies are reviewed annually and embedded into our corporate governance framework to ensure continuous alignment with legal and ethical expectations. All employees are made aware of these policies.

Our Modern Slavery Policy details our zero-tolerance approach to any form of slavery or human trafficking within our business and supply chains.

Ref:	Modern Slavery & Human Trafficking Statement	Issue date:	September 2025	Review	May 2026
Doc Owner:	Lace Dance	Position	Head of HR	Version	8.0

## Due Diligence and Risk Assessment

We continuously review and manage modern slavery risks in our business and supply chains through structured due diligence processes. Our due diligence is designed to establish and assess areas which present a risk of slavery and human trafficking and monitor such risks on an ongoing basis.

Key actions include:

- **Critical Supplier Focus:** Continued focus on and scrutiny of our 'Critical Approved Suppliers' to ensure alignment with our ethical standards and responsible sourcing principles.
- **Self-Assessment Questionnaires:** All suppliers are required to complete and return our revised *Supplier Self-Assessment Evaluation Questionnaire*, which includes targeted sections on labour practices, recruitment protocols and worker protection measures.
- **Enhanced Monitoring:** We regularly review and reinforce internal due diligence processes to better track, assess and engage with suppliers on key risk areas - particularly those operating in high-risk geographies or sectors.

We have also mapped tiers of our supply chain to identify areas where visibility needs improvement and where further engagement is required.

## Training and Awareness

We are committed to building awareness of modern slavery risks across all levels of our organisation. During the year, we shared educational materials via our internal platforms to highlight signs of forced labour and unethical recruitment.

## Grievance Mechanisms

To promote transparency and safe reporting, we have partnered with *NAVEX* to implement *WhistleB*, an independent third-party whistleblowing helpline. This channel is accessible to all employees and suppliers and is visibly promoted across our sites.

We have also rolled out our Employee Assistance Programme with *UNUM*, offering confidential support and advice to staff and their families — including support related to exploitation or coercion concerns.

To date, we have not received any reports relating to modern slavery or human trafficking in our operations or supply chain.

## Performance Indicators

We have made good progress in continuing to review the effectiveness of our modern slavery procedures. To measure our progress, we are tracking:

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- Completion rates of supplier assessments
- Training participation levels
- Number of reports or concerns raised and resolved
- Engagement with suppliers in high-risk categories

We are also exploring the development of key performance indicators to enhance monitoring and reporting going forward.

## **Future Commitments**

Looking ahead, we will continue to strive for increased engagement and communication across our business and with our suppliers. Our priorities include:

- Expanding due diligence to lower-tier suppliers;
- Reviewing contract templates to include stronger anti-slavery clauses;
- Enhancing our risk-mapping methodology;
- Increasing transparency through improved reporting and disclosure; and
- Training all managers in the requirements of our modern slavery policy.

## **Communication and Review**

This Statement is available to all employees and published on the Enovert website. It is reviewed annually by our Board of Directors and updated to reflect evolving best practices and legal requirements.

We will continue to keep our supply chains under review to monitor and identify ongoing and future risks. We will draw upon best practice, regulatory requirements and industry guidance to help strengthen our measures to detect and prevent slavery and human trafficking.

## **Board Approval**

This Statement is for the current financial year and has been approved by the Board of Directors for Enovert and signed on their behalf.

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