

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern Slavery has been recognised as emerging issue in today's society and it is of especially high risk in sectors where there is a large labour force on lower income, such as the cleaning industry. Nviro is an organisation committed to looking after its people to ensure that they have a safe and healthy working environment free from exploitation, in which they can thrive. As such Nviro takes a zero tolerance approach to modern slavery in all forms, including in our supply chain. The health, safety and well-being of our staff is top of our priority and critical to the Company's success: we look after our people so they look after our customers.

The first step in reducing the risk to our workforce is the education of our managers and staff to look out for the signs that an individual may be at risk.

Spotting indicators associated with the following;

- General behaviour – showing high levels of anxiety or fear, scavenging for food, poor levels of personal hygiene and appearance
- Physical appearance – regularly shows indications of injury or attack
- Accommodation – may be unclear of where they live or indicate residence is occupied by large numbers of fellow workers
- Financial – lack of access to money, salary is paid into bank account held in a third parties name or multiple employees sharing a single account
- Restricted movement – not in possession of personal documentation such as a passport, only able to travel to and from work with a certain individual

Nviro hold regular reviews of our internal process in relation to our workforce and those of our supply chain; responsibility for the Company's anti-slavery initiatives are as follows:

- Policies are reviewed annually by the Board of Directors.
- The Nviro Executive Committee meets monthly with all Senior Managers to make them aware of any new policies or changes made to current policies, including the risks involved in our supply chain regarding modern slavery.
- Nviro's Head of People leads any investigations relating to reports of known or suspected instances of modern slavery.
- Nviro's Commercial and Safety Manager is responsible for the development of the Company's partnership with our suppliers and provision of risk assessments. In collaboration with our Head of People, they measure the possible risks to ensure our supply chains are free from modern slavery activities.

Policies

Nviro has various policies and codes of conduct in place that address the possible modern slavery risks in our supply chain:

- **Whistleblowing Policy.** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee Code of Conduct.** Nviro's code makes clear to employees the actions and behaviour expected of them when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour.
- **Supplier Code of Conduct.** Nviro is committed to ensuring that suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with

Nviro Limited Board Approved. Policy last reviewed October 2018 (reviewed on an annual basis).

dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the Nviro Supplier Code of Conduct will lead to the termination of the business relationship.

- **Payroll Policy.** Nviro require all our employees to provide proof of bank account to ensure it belongs to them.

Due Diligence of Suppliers

Nviro undertakes due diligence when considering new suppliers, and regularly reviews its existing suppliers. In order to become an Approved Supplier, all candidates must undergo our New Supplier approval process which forms part of our Quality Management System and accreditation. Supply chain candidates are only approved if there is a clear business case; preventing unnecessary dilution of the core Approved Suppliers List. To complete the verification process, all supplier applications are reviewed by the Operations Director to ensure compliance with practices, and suitability to Nviro and its customers.

The Company's due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new supplier;
- Reviewing on a regular basis all aspects of the supply chain;
- Conducting supplier audits, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- Applying sanctions against suppliers that fail to improve their performance in line with an agreed action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Training

Nviro require all Senior and Front Line Management to complete training on modern slavery as a module within the Company's wider training programme. Nviro's modern slavery training covers:

- How to assess the risk of slavery and human trafficking in relation to the business;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the HR Department;
- What external help is available.

This statement was approved in October 2018 by Nviro's Board of Directors who review and update it annually.

Signed: 

Brian Warren
Managing Director

30 October 2018