

PRO ENVIRO LIMITED

Modern Slavery and Human Trafficking Policy

Energy, Sustainability and Net-Zero Consultancy

1. Purpose and Scope

Pro Enviro Limited ('the Company') is committed to acting ethically and with integrity in all its business dealings and relationships.

Modern slavery — encompassing slavery, servitude, forced or compulsory labour and human trafficking — is a grave violation of fundamental human rights and a serious criminal offence. This Modern Slavery and Human Trafficking Policy ('the Policy') sets out the Company's commitment to identifying, preventing and responding to modern slavery risks in its own operations and throughout its supply chain.

This Policy applies to all employees (whether permanent, fixed-term or temporary), directors, officers, consultants, contractors, agency workers, volunteers and any other individuals acting on behalf of Pro Enviro Limited ('Relevant Persons'). It also sets out the standards the Company expects of its suppliers and business partners.

As a certified B Corporation and a UN Global Compact signatory, Pro Enviro Limited is committed to upholding human rights across its operations and value chain, in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organization's (ILO) core labour standards.

While our company size means we are exempt from mandatory legal reporting, we adopt these standards voluntarily because it is the right thing to do.

2. Policy Statement

Pro Enviro Limited maintains a strict zero-tolerance approach to modern slavery and human trafficking in all its forms. We will not knowingly engage with, or facilitate, any individual, business or entity involved in slavery, servitude, forced labour or human trafficking, whether directly or through our supply chain.

We recognise that, as an energy, sustainability and net-zero consultancy, our direct operational footprint in relation to modern slavery risk is relatively limited. However, we acknowledge that our supply chain — including professional services, technology, facilities management, travel and events — may carry exposure to these risks, and we are committed to taking proportionate, risk-based steps to identify and address them.

We will conduct our business in a manner consistent with our responsibilities under the Modern Slavery Act 2015 and all other applicable human rights legislation, and we will continually improve our practices to combat modern slavery and human trafficking. This Policy is Voluntary

3. Definitions

For the purposes of this Policy, the following definitions apply:

- **Modern Slavery:** An umbrella term encompassing slavery, servitude, forced or compulsory labour and human trafficking. It involves the coercion, deception or abuse of power to exploit individuals for personal or commercial gain.
- **Slavery and Servitude:** The exercise of powers of ownership over a person, or the obligation to perform services imposed by the use of coercion, including debt bondage.
- **Forced or Compulsory Labour:** All work or service exacted from any person under the menace of any penalty and for which that person has not offered themselves voluntarily. Indicators include retention of identity documents, payment of recruitment fees and restriction of freedom of movement.
- **Human Trafficking:** The recruitment, transportation, transfer, harbouring or receipt of a person by means of threat, force, coercion, abduction, fraud or deception, for the purpose of exploitation (including sexual exploitation, forced labour, slavery, servitude or the removal of organs).
- **Supply Chain:** All suppliers, subcontractors, agents, consultants and other third parties that provide goods or services to the Company, at any tier.
- **Due Diligence:** The process by which the Company identifies, prevents, mitigates and accounts for how it addresses actual and potential adverse human rights impacts in its own operations and supply chain.

4. Recognising Modern Slavery — Warning Signs

Pro Enviro Limited will ensure that all Relevant Persons are aware of the indicators that may suggest modern slavery is taking place. Whilst the presence of any one indicator does not confirm exploitation, the following signs should prompt further enquiry and, where appropriate, a report to the Designated Lead:

4.1 Indicators Relating to Workers

- A person appears to be under the control of another individual and is not free to speak for themselves.
- A person lives and works at the same address, often with multiple other workers, in substandard or overcrowded conditions.
- A person appears malnourished, unkempt, exhausted or shows signs of physical abuse.

- A person does not have possession of their own identity documents (passport, national identity card or right to work documentation).
- A person is accompanied at all times by the same individual and appears reluctant to be alone with other people.
- A person appears to have their wages deducted at source for accommodation, food, transport or equipment, leaving little or no net pay.
- A person is unable to confirm their home address, employer's name or the terms of their employment.
- A person appears fearful, anxious, submissive or avoids eye contact when asked questions about their situation.

4.2 Indicators Relating to Business Practices

- A supplier or subcontractor is unable or unwilling to provide information about their workforce, wage arrangements or recruitment practices.
- Workers are recruited through agencies or labour providers that operate without appropriate licensing or accreditation.
- Pricing submitted by a supplier appears unsustainably low in a manner that could only be achieved through labour exploitation.
- A supplier demonstrates a pattern of high worker turnover, absenteeism or reluctance to allow unannounced site visits.
- Workers are hired and paid through an opaque or unnecessarily complex subcontracting chain.

5. Risk Assessment

Pro Enviro Limited will conduct a regular, structured assessment of modern slavery risk across its operations and supply chain. The Company acknowledges that risks vary considerably depending on geography, sector, product type, procurement method and the vulnerability of the workforce involved.

5.1 Own Operations

As a professional services consultancy, the Company's direct employment and operational risk is assessed as relatively low. However, we recognise that our operations involve the engagement of contractors, freelancers and agency workers, and that some categories of facility management, cleaning, catering and event services may carry higher inherent risk. All such engagements will be subject to proportionate due diligence.

5.2 Supply Chain Risk

The Company will map and categorise its supply chain by risk tier, taking account of the following factors:

- Geography — the extent to which suppliers or their own supply chains operate in countries identified as high risk by the Global Slavery Index, the ILO or the UK Foreign, Commonwealth and Development Office.

- Sector — whether the supply sector is associated with elevated modern slavery risk (including construction, cleaning, catering, agricultural produce, electronics and garments).
- Workforce — whether the supplier's workforce is likely to include migrant workers, agency workers or other potentially vulnerable groups.

5.3 Risk Review

The Company's modern slavery risk assessment will be reviewed annually or following any material change in the Company's operations, supply chain or relevant legal framework. The results will be used to prioritise due diligence efforts and inform the annual Modern Slavery Act Transparency Statement.

6. Due Diligence and Supply Chain Standards

Pro Enviro Limited will take proportionate, risk-based steps to identify and address modern slavery risk in its supply chain. The following measures apply:

6.1 Supplier Onboarding and Screening

- All new suppliers will be required to complete a supplier questionnaire that includes questions relating to modern slavery, labour practices, recruitment processes and subcontracting arrangements, prior to or at the point of onboarding.
- Suppliers will be screened against available modern slavery and forced labour indicators, including sanctions lists and adverse media.
- Suppliers in higher-risk categories may be subject to enhanced due diligence, which may include site visits, third-party audits or independent social compliance assessments.
- The Company will not engage a supplier who is unable to provide adequate assurances regarding their labour practices or who has a known history of modern slavery violations that has not been adequately addressed.

6.2 Contractual Requirements

- All supplier contracts will include representations and warranties confirming compliance with the Modern Slavery Act 2015 and applicable labour laws.
- Material supplier contracts will include a right of termination where the supplier is found to be in breach of applicable modern slavery or labour standards.
- Suppliers will be requested to flow down equivalent obligations to their own sub-suppliers and subcontractors where relevant.

6.3 Ongoing Monitoring

- The Company will conduct periodic reviews of existing supplier relationships, proportionate to risk tier and contract value.

- The Company will engage with its key suppliers to encourage continuous improvement in modern slavery awareness and prevention, including sharing guidance and training materials where appropriate.

6.4 Recruitment Practices

The Company is committed to fair and transparent recruitment. We will only use reputable employment agencies that comply with applicable employment law and the Gangmasters and Labour Abuse Authority (GLAA) licensing requirements where applicable. We will never charge recruitment fees to workers. All workers have the right to always retain possession of their own identity documents.

7. Reporting Concerns

Pro Enviro Limited encourages all Relevant Persons and members of the public to report any concern that modern slavery or human trafficking may be occurring, whether within the Company's own operations or in its supply chain. Reports will be treated seriously, investigated promptly and handled with appropriate confidentiality.

7.1 Internal Reporting

- Concerns should in the first instance be raised with the Designated Modern Slavery Lead (the Head of Sustainability), a line manager or the Compliance Officer.
- Where a concern relates to a member of senior management, it may be raised directly with the Chair of the Board.
- Concerns may also be submitted through the Company's confidential whistleblowing channel, as set out in the Whistleblowing Policy. Anonymous reports will be accepted, though the ability to investigate may be limited where insufficient information is provided.
- No individual who raises a concern in good faith will suffer any detriment, disadvantage or retaliation. Any such conduct will itself be treated as a serious disciplinary matter.

7.2 External Reporting

Where there are reasonable grounds to believe that a modern slavery or human trafficking offence has been committed, the Company will make a report to the appropriate external authority. Relevant Persons may also report concerns directly and independently to:

- The Modern Slavery Helpline: 0800 0121 700 (free, 24-hour, confidential).
- The National Crime Agency (NCA) via the National Referral Mechanism (NRM) — for potential victims who may require support and protection.
- The Gangmasters and Labour Abuse Authority (GLAA) — for concerns relating to labour exploitation in regulated sectors.
- The Police (999 for emergencies; 101 for non-urgent concerns).

7.3 Supporting Victims

Pro Enviro Limited will cooperate fully with law enforcement authorities in any investigation relating to modern slavery or human trafficking. Where the Company identifies or suspects that an individual is a victim of modern slavery, it will treat that person with compassion and sensitivity, seek appropriate specialist advice and, where applicable, refer them through the National Referral Mechanism. The Company will not take any action that could endanger a potential victim or impede a law enforcement investigation.

8. Training and Awareness

Pro Enviro Limited is committed to ensuring that all Relevant Persons have sufficient knowledge and awareness to identify modern slavery risks and understand the obligations under this Policy and the Modern Slavery Act 2015.

- All new employees and contractors must complete mandatory modern slavery awareness training as part of their induction programme.
- All Relevant Persons must complete annual refresher training. Completion rates will be tracked and reported to senior management.
- Employees in procurement, supply chain management, HR and senior leadership roles will undertake enhanced, role-specific training that addresses the practical application of due diligence procedures.
- Training content will be reviewed and updated annually to reflect changes in law, regulatory guidance, risk assessment findings and emerging good practice.
- The Company will share modern slavery awareness resources with key suppliers and encourage them to implement comparable training for their own workforces.
- Training records will be maintained and made available to relevant authorities upon request.

9. Roles and Responsibilities

Overall accountability for this Policy rests with the Board of Directors of Pro Enviro Limited. The following roles carry specific responsibilities:

- Board of Directors: Ultimate accountability for the Company's modern slavery and human rights obligations. Approve this Policy and the annual Modern Slavery Act Transparency Statement; receive annual compliance updates.
- Chief Executive Officer: Executive responsibility for embedding a culture of respect for human rights across all operations and the supply chain, and for ensuring adequate resources are committed to implementation.
- Designated Modern Slavery Lead (Head of Sustainability): Day-to-day responsibility for implementing this Policy; maintaining the risk assessment and due diligence records; co-ordinating the annual

Transparency Statement; and acting as the first point of contact for all concerns and queries.

- Procurement and Finance Teams: Ensuring that supplier onboarding, due diligence and contract management processes incorporate the requirements of this Policy and the Supplier Code of Conduct.
- HR Team: Ensuring that recruitment, right-to-work and employment practices comply with this Policy and applicable employment law; and that training is delivered and recorded.
- Managers and Team Leaders: Monitoring their teams and contracted workforces for warning signs of modern slavery; escalating concerns promptly; and ensuring direct reports complete required training.
- All Employees and Contractors: Reading, understanding and complying with this Policy; completing all required training; reporting any concerns or suspicions without delay.

10. Disciplinary Consequences

Any breach of this Policy by an employee will be treated as a serious disciplinary matter and may result in dismissal for gross misconduct. Breaches by contractors or third parties may result in immediate termination of the relevant contract and referral to the appropriate authorities.

Knowingly participating in modern slavery or human trafficking is a serious criminal offence under the Modern Slavery Act 2015, carrying a maximum sentence of life imprisonment. Pro Enviro Limited will cooperate fully with any law enforcement investigation and will report evidence of criminal conduct to the appropriate authorities.

Disciplinary action will apply equally to any individual who victimises, intimidates or retaliates against a person who has raised a concern in good faith under this Policy.

11. Modern Slavery Act Transparency Statement

Pro Enviro Limited will voluntarily produce an annual Transparency Statement that will set out the steps taken during the financial year to assess and address modern slavery risk, and will be approved by the Board, signed by the directors and published on the Company's website.

The Transparency Statement will be structured in accordance with the six areas of recommended disclosure set out by the Home Office, covering:

- The Company's structure, business and supply chains.
- The policies in relation to slavery and human trafficking.
- The due diligence processes in relation to slavery and human trafficking in its business and supply chains.
- The parts of the Company's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps taken to assess and manage that risk.

- Key performance indicators used to measure effectiveness of the steps being taken.
- The training available to staff.

12. Monitoring, Review and Continuous Improvement

Pro Enviro Limited will monitor the effectiveness of this Policy and its associated procedures on an ongoing basis. The Designated Modern Slavery Lead will report to the Board on the following metrics on at least an annual basis:

- Number of suppliers screened, categorised by risk tier, during the reporting period.
- Number of enhanced due diligence assessments or audits conducted and key findings.
- Number and nature of modern slavery concerns reported internally or externally, and outcomes of investigations.
- Training completion rates across all employee and contractor categories.
- Material changes to the Company's supply chain or risk profile that affect the modern slavery risk assessment.
- Actions taken in response to identified risks or incidents, including any remediation measures implemented.

This Policy will be formally reviewed by the Board no less than annually, or sooner in the event of a material change in law or regulatory guidance, a significant incident or allegation, or a substantive change in the Company's operations or supply chain. All employees will be informed of updates, and the current version will be maintained on the Company Quality Management System and on the Company Website and made available to suppliers on request.

Pro Enviro Limited is committed to continuous improvement in its approach to combating modern slavery and seek to adopt emerging best practice in human rights due diligence, in anticipation of forthcoming mandatory human rights due diligence legislation.

13. Related Policies and Documents

This Policy should be read in conjunction with the following Pro Enviro Limited policies and documents:

- Anti-Corruption and Bribery Policy
- Whistleblowing Policy
- Supplier Code of Conduct
- Equality, Diversity and Inclusion Policy
- Health and Safety Policy
- Data Protection and Privacy Policy
- Modern Slavery Act Transparency Statement (published annually)

14. Policy Approval and Sign-Off

This Policy has been approved by the Board of Directors of Pro Enviro Limited and takes effect from the date shown below.

While our company size means we are exempt from mandatory legal reporting, we adopt these standards voluntarily because it is the right thing to do.

Approved by:

Name: Nersi Salehi

Position: Managing Director

Signature: _____

Date: 20th May 2026

Approved by:

Name: Diane Salehi

Position: Director

Signature: _____

Date: 20th May 2026

