

PRO ENVIRO LIMITED

Modern Slavery and Human Trafficking Policy

Energy Engineering, Sustainability and Decarbonisation 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, as defined by the Modern Slavery and Human Trafficking Act 2015 ('the Act') and associated Statutory Guidance, encompasses slavery, servitude, forced or compulsory labour, internal and cross border human trafficking. These behaviours are grave violations of fundamental human rights and serious criminal offences.

Pro Enviro's Modern Slavery and Human Trafficking Policy ('the Policy') demonstrates the company's

- commitment to identifying, preventing and responding to modern slavery risks in our own operations and throughout our supply chain.
- compliance with the Act and associated Statutory Guidance;

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. We accord with the UN Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organization's (ILO) core labour standards.

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, as a client 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.
- Our client base, particularly within the Agri-Tech, Food Processing, and farming sectors

may carry exposure to these risks. 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 Act' and all other applicable human rights legislation, and we will continually improve our practices to combat modern slavery and human trafficking.

3. Definitions

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

- **Modern Slavery:** An umbrella term encompassing slavery, servitude, forced or compulsory labour, internal and cross border 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 using 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). We note and acknowledge that the statutory and caselaw definition of trafficking does not require the 'international' movement of a person but applies equally to internal movements of victims within the United Kingdom.
- **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.
- **Clients:** all customers of Pro Enviro's consultancy or subcontracted services.

4. Recognising Modern Slavery — Warning Signs

Pro Enviro Limited ensures 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 (Pro Enviro Compliance Officer or Director):

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 and Risk Review

The Company acknowledges that risks vary considerably depending on geography, sector, product type, procurement method and the vulnerability of the workforce involved.

Pro Enviro Limited will conduct;

- a structured modern slavery risk assessment of all new suppliers and clients, and
- modern slavery risk reviews across its operations and supply chain 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.

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 may 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.
- Procurement method — whether the method used to procure services creates pressure on margins that could incentivise labour exploitation.
- Contractual relationships — the degree of the Company's ability to exercise leverage over supplier behaviour through contractual and commercial terms.

5.3 Client Risk

Our client base is extensive. Our expertise is sought after across all energy intensive sectors of the UK Economy. We acknowledge that our work within the Agri-Tech, Food Processing, and Farming sectors means engagement within sectors with disproportionately high levels Human Trafficking Cases and of engagement with the Gang Masters and Labour Abuse Authority

6. Due Diligence, Supply Chain and Client 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/ Sub Contractor Onboarding and Screening

- All new suppliers and sub-contractors 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.
- The Company will not engage a new supplier or sub-contractor 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 sub-contractors contracts will include representations and warranties confirming compliance with the Modern Slavery Act 2015 and applicable labour laws.
- Sub- contractors 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 Client Assessment

- Consultants, all of whom are trained in Modern Slavery and Human Trafficking risks will use 'Modern Slavery Warning Signs' (Section 4) to assess and where necessary report any suspected offences to the Pro Enviro Accounting Officer.

Ongoing Monitoring

- The Company will conduct periodic reviews of existing supplier, sub-contractor and client relationships, proportionate to risk tier and contract value.
- Any supplier, sub-contractor or client who discloses a modern slavery incident or allegation during the contract period will be required to provide a remediation plan within 30 days and to work collaboratively with the Company to implement corrective actions.
- The Company will engage with its key suppliers, sub-contractors and clients 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 to report any concern that modern slavery or human trafficking may be occurring, whether within the Company's own operations, in its supply chain or client base. 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 (Compliance Officer), a line manager, or a Director.
- Where a concern relates to a member of senior management, it may be raised directly with the Managing Director.
- 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 their 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 refresher training where there is any material change to the law, statutory guidance or to the nature of Pro Enviro's operations. Completion rates will be tracked and reported to senior management.
- Training content will be reviewed annually to reflect any changes in law, regulatory guidance, risk assessment findings and emerging good practice.
- The Company is willing to share modern slavery awareness resources with key suppliers and sub-contractors and encourage them to implement comparable training for their own workforces.

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.
- Managing Director: 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 (Compliance Officer): 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 Team: 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 disciplinary matter and may result in misconduct or gross misconduct procedures. 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.

Pro Enviro's whistleblower policy will apply 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 is not required under Section 54 of the Modern Slavery Act 2015 to publish an annual Transparency Statement. Due to our commitment to identify, preventing and responding to modern slavery risks we will produce an annual Transparency Statement that will set out the steps taken during the

financial year to assess and address modern slavery risk, to be approved by the Board, signed by a Director 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.

The Transparency Statement will reference the Company's B Corp Impact Assessment disclosure, UN Global Compact Communication on Progress and any relevant third-party assessments where these substantiate progress made.

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 intranet and made available to suppliers on request.

Pro Enviro Limited is committed to continuous improvement in its approach to combating modern slavery. We will benchmark our practices against recognised frameworks — including the UN Guiding Principles on Business and Human Rights Reporting Framework, the ILO's indicators of forced labour and the Ethical Trading Initiative Base Code — 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:


- Corporate and Social Responsibility Policy
- 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.

Approved by:

Name: MERSI SALEHI Position: Managing Director,

Signature:  Date: 20/5/2026

Approved by:

Name: DIANE SALEHI Position: Director

Signature:  Date: 20/5/2026

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Review Date: May 2027

