

Adler and Allan Group Ltd & the Modern Slavery Act 2015

This statement ensures that the Adler and Allan Group complies with section 54 of the Modern Slavery Act 2015 and sets out the responsibilities for employers and employees. The Company is committed to driving out modern day slavery within its own business and supply chains.

The Adler and Allan Group is committed to ensuring that all of its business operations are free from involvement with slavery or human trafficking.

The Company is committed to:

- ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility.
- ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure.
- carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK.
- ensuring that all commercial agreements include an obligation on our customers, suppliers and sub-contractors to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act.
- identifying and addressing any areas of high risk in the Company and related operations.
- providing training for all employees on issues relating to slavery and human trafficking.

Policy Statement

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This policy statement thus defines the Company's commitment to ensuring that human trafficking and slavery does not exist within its own business, but also provides how the Company will make efforts to eradicate the same from other businesses with whom it shall maintain a relationship (and especially from within its supply chain).

The Human Resources team, the Group Procurement Manager and members of the Compliance team will take appropriate steps to ensure not only its own compliance but also that these requirements are followed by its suppliers, subcontractors and/or business partners. The Company expects all Managers and employees to support the principles contained in this policy.

All Suppliers are required to adhere to the following:

Human Trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or

benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Forced Labour: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

Harmful Child Labour: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

Requirements for Suppliers:

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
- Will ensure that the overall terms of employment are voluntary;
- Will comply with the minimum age requirements prescribed by applicable laws
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
- Will abide by applicable law concerning the maximum hours of daily labour;
- Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK; and
- Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to the Adler and Allan Group Ltd, also adhere to these requirements.

Certification

Suppliers will certify compliance with this Policy and their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.

Audits

Upon request, Suppliers must be able to demonstrate compliance with this Policy to the reasonable satisfaction of Adler and Allan. The Company may perform periodic audits on this Policy and Suppliers are expected to fully co-operate with any such audit.

Reporting

Any breach of this Policy (including by a Supplier) can be reported (in confidence, if required) by contacting the Human Resources Department.

Consequences

Any breach of this Policy extremely seriously. Suppliers who are found to have or be engaging in human trafficking and slavery or who refuse to co-operate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract terminated immediately, without compensation.

If a Supplier is found in violation of this policy, the Company will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supplier. It shall also take such other steps as necessary to address the violation and seek to prevent its reoccurrence.

Policy Statement Year End 30TH September 2019

The Adler and Allan Group, is a provider of specialist environmental and asset management services to a range of businesses that handle, store and utilize hazardous liquids, principally oil-based fuels. The Group's targeted services have been developed to help its customers meet ever increasing regulatory and compliance-related obligations in particular by maintaining the integrity of their assets. A&A's services are performed by its highly skilled and accredited workforce on a planned and reactive basis from service centres around the UK.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 March 2017.

This annual statement contains a summary of actions undertaken in relation to adherence to the Act and the Company continues to engage with a large number of private and public sector organisations in pursuit of company business. The Company's activities are predominantly undertaken in the EU.

The Company has instilled managerial responsibility and general awareness of the act and the Company's policy, reconfirming responsibilities for this policy and statement and actions have received unanimous endorsement from our Executive Board.

The Company's policy has been circulated and the Company has raised awareness of this published statement and the Modern Slavery Act by notifying all employees and other organisations in our frameworks, delivery partnerships and other companies with which we regularly engage.

Actions Undertaken:

- Completed a review of this policy and statement against activities to establish whether the approach taken follows best practice;
- Assessed and interpreted any recent or emerging case law and best practice;
- Undertaken a risk assessment using professional legal, risk, procurement and regulation teams to determine our risk exposure.
- Introduced new processes and procedures in relation to procurement and due diligence, confirmed the applicability and enforceability of clauses and conditions included in our legal agreements and contracts.
- Circulating this policy to all staff to promote awareness and adherence to core principles and ethical, responsible behaviour in business.
- Review of the policy and any updates likely to arise following the conclusion of Brexit with appropriate amendments made to ensure compliance and adherence in business practices.

Supply chain and Business Due Diligence

The Company's procurement activities take place in England; and associated contractors and suppliers are predominantly UK and EU based. The Company typically hosts between £20m and £25m competitive procurements annually.

The Company maintains a number of professional services and development framework agreements within the industry; in addition, the Company also maintains a number of other frameworks for exclusive use including legal services.

The Company's procurement framework enables users to draw-down professional multi-disciplinary services and development expertise. This includes the services of industry companies, with their associated goods, materials and labour-related supply chains. In a typical year, the Company procures £20m of services through associated frameworks.

In common with many organisations, employees occasionally stay in UK hotels when conducting business away from the office. Accommodation and travel arrangements are organised by the

Company. The Company also occasionally procures meeting and conference venues to support general business activities and these are selected to ensure good value for money. The Company acknowledges that the hotel and hospitality trade recognise the risk of modern slavery within their sector.

Procurement and Tender Process Improvements

Existing tender documentation includes the mandatory exclusion of any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

The Company acknowledges the UK's departure from the EU may result in some changes to the procurement practices within the UK and the remaining Member States; however, the process described above are likely to continue for the next few years with regular review by the Group Procurement Manager and other stakeholders to ensure adherence to the Act. .

Expectation and Encouragement

The Company expects all organisations within frameworks and other companies engaged to ensure their goods, materials and labour-related supply chains:

- Fully comply with the Modern Slavery Act 2015;
- Transparent, accountable and auditable;
- Free from ethical ambiguities.

The Company encourages organisations within frameworks and other companies engaged apply as appropriate the Modern Slavery Act and other associated legislation.

Management responsibility and General Awareness

The Company will;

- Report progress to the Executive Team;
- Continue to raise awareness of this published statement by re-notifying organisations in our frameworks and other companies with which we regularly engage;
- Remind employees of the Company's obligations under the Act.
- Prepare an annual statement for publication in 2018.

Signed:



Mike Willink
Managing Director

Date: 30th September 2019