

Adler & Allan Limited & the Modern Slavery Act 2015

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 (the **Act**) and sets out the steps Adler & Allan Limited and its group continues to take to ensure that slavery, forced labour and human trafficking are not taking place in the supply chain or in any part of the organisation.

This statement ensures that the Adler & Allan Group complies with section 54 of the Act and sets out the responsibilities for employers and employees. This statement is made on behalf of Adler & Allan Limited and its subsidiaries and associated companies listed below (the **Group**). The Group is committed to driving out modern-day slavery within its own business and supply chains.

The Group is committed to ensuring that all its business operations are free from involvement with slavery or human trafficking. The Group 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.
- Conducting 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 subcontractors to operate in accordance with the Act, 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 Group 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 defines the Group's commitment to ensuring that human trafficking and slavery does not exist within its own businesses, but also provides how the Group will make efforts to eradicate the same from other businesses with whom it shall maintain a relationship (and especially from within its supply chain).

Members of the Executive Board, Finance, Human Resources, SHEQ and Procurement teams will take appropriate steps to ensure the Group's compliance but also that these requirements are followed by its suppliers, subcontractors and/or business partners. The Group expects all Managers and employees to support the principles contained in this policy.

All Suppliers and clients are expected to demonstrate awareness and safeguarding practice in relation to the following:

Human Trafficking: the recruitment, transportation, transfer, harboring, 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 conducted 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 Group, 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 the Group. The Group 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) through our whistleblowing procedure or by contacting the Human Resources Department.

Consequences

Any breach of this Policy is extremely serious. 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 Group 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 any recurrence.

Policy Statement

The Adler & Allan Group is a provider of specialist environmental consultancy and asset engineering services to a range of businesses that manage, store, and utilise hazardous pollutants, as well as transforming energy infrastructure. The Group's targeted services have been developed to help its customers meet ever-increasing regulatory, ESG (Environmental, Social, and Governance) and compliance-related obligations by maintaining the integrity of their assets and environments.

The Group's services are performed by its highly skilled and accredited workforce on a planned and reactive basis from service centers around the UK. This statement is made pursuant to section 54(1) of the Act for the financial year ending 30 September 2023.

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

The Group has instilled managerial responsibility and general awareness of the act and its policy, reconfirming responsibilities for this policy and statement and actions have received unanimous endorsement from the Executive Board of Adler and Allen Group Ltd.

The Group's policy has been circulated and the Group has raised awareness of this published statement and the 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.



ENVIRONMENTAL RISK REDUCTION

Supply chain and Business Due Diligence

The Group's procurement activities take place in the UK; and associated contractors and suppliers are predominantly UK and EU based. The Company hosts competitive procurements annually, typically of a value in the region of £75,000.

The Group has an ISO compliant onboarding process which it regularly renews and refreshes. The Group requires all those involved in our supply chain to have similar processes in place to avoid using labour derived from modern slavery.

These policies are reviewed at onboarding and periodically throughout a supplier's time in the Group.

Expectation and Encouragement

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

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

The Group encourages organizations within frameworks and other companies engaged apply as appropriate the Act and other associated legislation.

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

Management responsibility and General Awareness

The Group will:

- Report on progress to the Executive Team of the Group.
- 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 Group's obligations under the Act.
- Prepare an annual statement for publication.



ENVIRONMENTAL RISK REDUCTION

Subsidiaries and associated companies

The below are subsidiaries or associated companies of Adler & Allen Ltd for which this statement is applicable.

- OHES Environmental Services Limited
- AMGS Electrical Limited
- Detectronic Limited
- Flotech Performance Systems Limited
- E&S Environmental Services Limited
- Oneline Surveys Limited
- Aqua Consultants Limited
- Jet Aire (DC) Limited
- Aqueous 1st Kwikflow Limited
- Public Sewer Services Limited
- Public Water Services Limited
- Alker Holdings Limited
- Detectronic Holdings Limited
- E&S Holdings Limited
- AJ Bayliss (Petroleum Engineers) Limited
- QEMS Limited

Henrik Pedersen

A handwritten signature in black ink, appearing to read 'Henrik', is placed over a light grey, textured rectangular background.

Chief Executive Officer Date:

March 2024