

## **4 Seasons Environmental Services Ltd**

### **Modern Slavery Policy**

#### **1. Introduction**

##### **1.1 Our Commitment**

4 Seasons Environmental Services Ltd is committed to operating with integrity, transparency, and respect for fundamental human rights. We have a zero-tolerance approach to modern slavery, human trafficking, forced labour, and child exploitation in any form.

##### **1.2 Defining Modern Slavery**

Modern slavery is a serious violation of human rights and includes:

- Forced labour or servitude
- Child labour
- Human trafficking
- Debt bondage
- Exploitation through coercion, threats, or deception

This policy outlines our approach to identifying, preventing, and addressing modern slavery within our operations and supply chains.

##### **1.3 Scope of Policy**

This policy applies to all individuals working for or on behalf of 4 Seasons Environmental Services Ltd, including but not limited to:

- Employees
- Directors and officers
- Contractors and subcontractors
- Consultants and agency workers
- Suppliers and service providers

Failure to comply with this policy may result in disciplinary action, contract termination, and legal consequences.

#### **2. Prevention and Due Diligence**

##### **2.1 Employment Practices**

We ensure fair and ethical employment practices, including:

- Verifying the identity and right to work of all employees
- Providing clear and legal employment contracts
- Paying at least the National Minimum Wage/Living Wage
- Ensuring compliance with working time regulations, including rest breaks and holidays
- Promoting a safe and healthy work environment

##### **2.2 Supply Chain Monitoring**

To mitigate the risk of modern slavery in our supply chain, we:

- Conduct due diligence on suppliers before engagement
- Require suppliers to confirm their compliance with modern slavery laws
- Expect suppliers to have an anti-slavery policy and ethical labour practices
- Reserve the right to terminate contracts with non-compliant suppliers

### 3. Reporting and Compliance

#### 3.1 Reporting Concerns

All employees, workers, and suppliers must immediately report any suspicions or concerns regarding modern slavery within our business or supply chains. Reports should be made to the designated **Anti-Slavery Officer (ASO)**. Reports will be treated seriously, investigated thoroughly, and addressed appropriately.

#### 3.2 Protection for Whistleblowers

We encourage open communication and ensure that individuals who report concerns in good faith will not suffer retaliation, dismissal, or any other adverse treatment. Employees should refer to our **Grievance and Whistleblowing Policies** if they believe they have faced unfair treatment.

### 4. Responsibilities

#### 4.1 Management Responsibilities

- Ensure compliance with this policy across all operations
- Provide training to managers and employees on modern slavery risks
- Conduct periodic risk assessments and audits

#### 4.2 Supplier Responsibilities

- Confirm compliance with all applicable modern slavery legislation
- Provide an anti-slavery policy upon request
- Immediately notify us of any suspected breaches within their supply chain

#### 4.3 Employee Responsibilities

- Read, understand, and comply with this policy
- Be vigilant and report any suspected instances of modern slavery
- Cooperate with investigations related to modern slavery concerns

### 5. Review and Updates

This policy will be reviewed annually and updated as necessary to reflect changes in legislation and business practices. The latest version of this policy will be available to all employees and stakeholders.

**Date:** 10/04/2025

**Name:** Anjum Sheikh

**Position:** Director

**Signed:** 

**For and on behalf of 4 Seasons Environmental Services Ltd**