

**MODERN SLAVERY / ANTI-HUMAN TRAFFICKING POLICY****Issue No:** 7**Issue Date:** 22 August 2024**Effective Date:** 22 August 2024**Author:** Group Compliance Officer**Approval:** Group General Counsel &  
Company Secretary**Authorised:** Group CFO**EM TOPCO LIMITED AND SUBSIDIARIES (ELEMENT)****1. POLICY**

- 1.1 Slavery and human trafficking (**Modern Slavery**) are crimes and a violation of human rights. Modern Slavery involves the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 Element has a zero-tolerance approach to Modern Slavery. Any instance of Modern Slavery in Element's business or supply chain is a breach of Element's core values and of this Policy.
- 1.3 The following key principles apply to Element's business and supply chain:
- 1.3.1 Child labour must not be used.
  - 1.3.2 Any form of forced or compulsory labour must not be used. Workers must be free to leave employment or work after reasonable notice.
  - 1.3.3 Passports, visas and other personal documentation should not be taken from employees unless requested to be held by the employee for safekeeping purposes (and, if held for safekeeping purposes, they should be returned to the employee on request).
  - 1.3.4 All forms of debt bondage are prohibited. Workers should not be subject to contracts that tie them into repaying a loan (other than small loans to cover items such as transport costs), excessive accommodation expenses or other costs that they have no or little opportunity to repay.
  - 1.3.5 Compensation and benefits must comply with local laws relating to minimum wages, overtime hours and other benefits.
  - 1.3.6 Overtime shall be always voluntary and not forced on the employee by intimidation or any form of coercion.
  - 1.3.7 The formation of trade unions and powers of collective bargaining should be respected.
  - 1.3.8 Suppliers shall ensure the health, safety and welfare of their workers.
- 1.4 As required by the UK Modern Slavery Act 2015, Element will publish on an annual basis a Modern Slavery transparency statement which will set out our approach to prevent Modern Slavery within Element's business and supply chain.

**2. PROCEDURES**

- 2.1 Element is committed to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in its business or in its supply chain. Such controls vary by sector and division, but may include: Modern Slavery policies and procedures; training; risk assessments; supply chain due diligence; whistleblowing policies; and contractual controls.
- 2.2 Element's subcontractors, consultants and suppliers are expected to maintain effective systems and controls to ensure Modern Slavery is not connected to their supplies and services to Element.

**3. REPORTING CONCERNS**

- 3.1 Employees, subcontractors, consultants and suppliers should report the existence of, or suspicions of, Modern Slavery existing in or being connected to Element's business or supply chain.
- 3.2 Reports or suspicions may be reported to an Element line manager, or to a regular contact at Element, or a confidential whistleblower / Speak Up service – Safecall at [www.safecall.co.uk/reports](http://www.safecall.co.uk/reports).