



No	Overview of Amendment and Text affected	Effective Date	Authorisation
1	Footers updated, front page inserted	8/8/16	JFuller
2	Date updated and signature	28/1/18	JFuller
3	Update of scope	30/01/18	T Bamber
4	Updated and signed	05/02/18	T Bamber
5	Updated and signed	14/1/19	T Bamber
6	Updated and signed	7/1/20	T Bamber
7	Updated and signed	20/4/21	J Roberts
8	Updated and signed	12/05/2021	P Pearson
9	Updated for Rebrand and Signed	20/1/2022	M.Holmes
10	Updated and Signed	17/1/2023	J Roberts
11	Date updated and signed	17/1/2024	P Pearson
12	Updated with new logo and branding	18/7/24	J Roberts
13	Update with new Anti-Harassment Policy	13/11/24	J Roberts



ANTI-SLAVERY POLICY

Introduction

Biogenie Remediation UK is a private limited company (Biogenie) owned by Ortec Group.

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the current financial year.

The Statement sets down Biogenie's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational Structure and Supply Chains

Biogenie is a world leader in providing integrated environmental services which operates in the UK and Northern Ireland, Ireland and Mainland Europe. Over 1000 sites in the UK have undergone successful assessment and remediation.

The following is the process by which the Company assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking:

- use of a managed Approved Suppliers Database and Supplier and Sub-contractor approval via PQQ and assessment.

High Risk Activities

The following activities are considered to be at high risk of modern slavery or human trafficking:

- Material and equipment supplies

Responsibility for the Company's anti-slavery initiatives is as follows:

1. **POLICIES:** The HR Department is responsible for creating and reviewing policies. The process by which policies are developed is by review of best practice and the adapting needs of the Company.
2. **RISK ASSESSMENTS:** The Health and Safety Manager is responsible for Risk Assessments in respect of human rights and modern slavery by a process of review and Risk Assessment.
3. **DUE DILIGENCE:** UK Commercial Director is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.



Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to receive Induction training and annual Policy acceptance.

Biogenie is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

POLICIES

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- a) **Whistleblower Policy** – the Company encourages all its workers, customer and other business partners to report any concerns related to its direct activities or its supply chains.
- b) **Employee/ Company Code of Conduct** - The Code of Conduct sets down the actions/behaviour expected of employees when representing the Company.
- c) **Corporate Social Responsibility (CSR) Policy** - The Company's CSR Policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.
- d) **Equality, Diversity & Inclusion Policy** – Our Policy demonstrates our commitment to ensure all our employees and job applicants are treated fairly and ethically.
- e) **Anti-Harassment Policy** – We are committed to providing a working environment that is free of sexual harassment, harassment and bullying and where everyone is treated with dignity and respect. The Anti-Harassment Policy sets very clear expectations about what is acceptable and unacceptable behaviour in the workplace and the consequences of not adhering to this Policy.



- f) **Recruitment and Selection Policy** – Our Company is committed to ensuring that our recruitment practices are based on the applicant’s abilities and individual merit. We operate a fair and consistent selection process without due regard to gender, race, sexual orientation, religion or belief, pregnancy and maternity, marriage and civil partnership, gender reassignment, age and disability.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company’s due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Regular Reviews

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Management Team endorses this Policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Julia Roberts
Position: Managing Director
Date: 17 January 2024

Signature:

A handwritten signature in blue ink, appearing to be "JR", is written over a light blue circular stamp.