

SLAVERY AND HUMAN TRAFFICKING STATEMENT

DEFINITIONS

Arco Environmental Ltd considers that modern slavery encompasses:

- 1. Human trafficking;
- 2. Forced work, through mental or physical threat;
- 3. Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- 4. Being dehumanised, treated as a commodity or being bought or sold as property;
- 5. Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

- 1. Arco Environmental Ltd, acknowledges its responsibilities under the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking within its own businesses and in its supply chains.
- 2. Arco Environmental Ltd has a zero- tolerance policy towards modern slavery. It will refrain from entering into business, and/or will discontinue any current business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

















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- 3. The labour supplied to Arco Environmental Ltd, in pursuance of the services it provides is carried out wholly in the countries where those services are provided
- 4. No labour provided to Arco Environmental Ltd in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Arco Environmental Ltd strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, Republic of Ireland, and in many cases exceeds those minimums in relation to its employees.
- 5. Arco Environmental Ltd offers employment contracts on a guaranteed hours basis only; no offers of employment are made on a zero hours basis.
- 6. Part-time and fixed-term employees within Arco Environmental Ltd are provided with the same pro-rata contractual entitlements as full-time and permanent employees. If these are not offered, Arco Environmental Ltd is able to rely on objectively justifiable grounds.

POTENTIAL EXPOSURE

- 1. Arco Environmental Ltd considers its exposure to modern slavery to be limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.
- In the operation of its business, Arco Environmental Ltd main supply chains are those related to the provision of services. Arco Environmental Ltd considers its main exposure to the risk of slavery and human trafficking to exist in its supply chains.

STEPS

















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- 1. Arco Environmental Ltd carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its supply chains.
- 2. Arco Environmental Ltd has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.
- 3. In accordance with section 54(4) of the Modern Slavery Act 2015, Arco Environmental Ltd has contacted (or attempted to contact) all first tier suppliers to set out our zero-tolerance stance on modern slavery and to ensure that slavery and/or human trafficking is not taking place.
- 4. Arco Environmental Ltd encourages use of whistleblowing to report any concerns regarding modern slavery and will investigate any complaints thoroughly.

TRAINING

1. Arco Environmental Ltd also provides training on awareness of modern slavery to those within the company who have been identified as having responsibilities in this regard, namely those involved in finance and procurement. The company ensures that annual update training is provided.

ASSESSMENT OF EFFECTIVENESS IN COMBATTING MODERN SLAVERY

- To ensure effectiveness in combatting modern slavery, the company
 maintains an accurate supplier list including contact details. It will ensure
 action is taken in response to reports of modern slavery in its supply chains
 and any complaints made via whistleblowing will be responded to in
 accordance with the policy.
- 2. Following a review undertaken for the company's statement of the previous financial year, Arco Environmental Ltd confirms its supplier list is up to date for the current financial year.

















3. As in the previous financial year, there have been no reports that any of the company's suppliers have been involved in activities covered by the Modern Slavery Act.

GROUP DATA PROTECTION & COMPLIANCE OFFICER

Arco Environmental Ltd has a company Data Protection & Compliance Officer, to whom all concerns regarding modern slavery should be addressed. The company Data Protection & Compliance Officer undertakes an annual review of the company's obligations towards eradicating modern slavery within its organisation and supply chains.













