

No	Overview of Amendment and Text affected	Effective Date	Authorisation
1	Update of footers, front page added	05/01/17	J Fuller
2	Review and update of text	20/01/17	T Bamber
3	Signed by MD for 2018	30/4/18	J Roberts
4	Review and signed by MD for 2019	30/1/19	J Roberts
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ANTI-SLAVERY POLICY

1 Introduction

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

The Statement sets down Celtic Technologies Ltd / Biogénie Site Remediation Ltd 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.

2 Organisational Structure and Supply Chains

This Statement covers the business activities of Celtic Technologies Ltd / Biogénie UK Ltd which are as follows:

Celtic is a subsidiary of EnGlobe Corp., a world leader in providing integrated environmental services which operates in the UK and Ireland. The successful assessment and remediation of over 1,000 sites in the UK.

The Company currently operates in the following countries:

- UK and Northern Ireland, Ireland and Mainland Europe.

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.

3 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:

- POLICIES:** Corporate 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.
- 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.
- DUE DILIGENCE:** UK Quality and Commercial Director is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

4 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.

5 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:

- Whistleblowing policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.

ANTI-SLAVERY POLICY

- b) **Employee/ Company Code of Conduct** - The Code of Conduct sets down the actions and 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.

6 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.

7 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: 31st January 2019

Signature:

