ETIVE

ETIVE CONSULTING ENGINEERS LIMITED Modern Slavery and Human Trafficking Policy January 2024

Introduction

The Policy is in relation to ETIVE CONSULTING ENGINEERS LIMITED, incorporated in Scotland (Registered No. SC460441) with its registered office at 22 Rutland Street, Edinburgh, EH1 2AN ("the Company") and its commitment to preventing slavery and human trafficking in its business activities and the steps it has put in place with the aim of ensuring that there is no slavery or human trafficking in its 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.

- 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.
- 1.1.The Company has a zero-tolerance approach to Modern Slavery. Any instance of Modern Slavery in The Company's business or supply chain is a breach of The Company's core values and of this Policy.
- 1.2. The following key principles apply to The Company's business and supply chain:
 - 1.2.1. Child labour must not be used.
 - 1.2.2. Any form of forced or compulsory labour must not be used. Workers must be free to leave employment or work after reasonable notice.
 - 1.2.3. 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).
 - 1.2.4. 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.
 - 1.2.5. Compensation and benefits must comply with local laws relating to minimum wages, overtime hours and other benefits.
 - 1.2.6. The formation of trade unions and powers of collective bargaining should be respected.
- 1.3.As required by the UK Modern Slavery Act 2015, The Company will publish on an annual basis a Modern Slavery transparency statement which will set out our approach to prevent Modern Slavery within The Company's business and supply chain.

2. Procedures

2.1. The Company 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 may include: Modern Slavery policies and procedures; training; risk assessments; supply chain due diligence; whistleblowing policies and contractual controls.

2.2. The Company'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 The Company.

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 The Company's business or supply chain.
- 3.2. Reports or suspicions may be reported to Grant Simpson, or to a regular contact at The Company.

This Policy has been approved and authorised by:

Name: Grant Simpson

- **Position**: Director
- Date: 1 January 2024

Signature: CSS

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ETIVE CONSULTING ENGINEERS LIMITED Modern Slavery and Human Trafficking Statement January 2024

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.

This statement covers the business activities of the Company which are as follows:

The Company's business is as a consulting civil and structural engineering practice.

Organisational structure and supply chains

The Company currently only operates in the United Kingdom of Great Britain and Northern Ireland.

Higher Risk Activities

The Company considers that the majority of its activities are low risk in relation to modern slavery or human trafficking. However, it is recognized that a higher risk may be presented where the Company works with a contractor who may not operate the same, stringent labour practices.

Responsibility

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

- 1. Policies: Grant Simpson (Director) is responsible for creating and reviewing policies in collaboration with the Administration Manager. The process by which policies are developed is by looking at best practice and adapting to the needs of the Company.
- 2. Risk assessments: Grant Simpson is responsible for risk assessments in respect of human rights and modern slavery by a process of review and assessment.
- 3. Due diligence: Grant Simpson 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 those with responsibility for the management of staff to undertake training on an annual basis.

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 Company's Whistleblowing Policy should be referred to as it encourages all our workers, customers, contractors and other business partners to report any concerns related to its direct activities or its supply chains.

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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.
- Evaluating the modern slavery and human trafficking risks of each new supplier.

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all (relevant) staff to have completed training on modern slavery on an annual basis.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Company Directors endorse this policy statement and are fully committed to its implementation.

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

Name: Grant Simpson

Position: Director

Date: 1 January 2024

Signature: CSS