



Mitchell Drainage and Environmental Solutions Limited

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MODERN SLAVERY POLICY STATEMENT

This statement is made on behalf of Mitchell Drainage and Environmental Solutions Ltd ("Mitchell Drainage"). Pursuant to Section 54(1) of the Modern Slavery Act (the "Act") and constitutes its slavery and human trafficking statement.

Mitchell Drainage is a limited company registered in England and Wales (company number 3636184).

The business always works to the highest ethical standards and ensures that it complies with all laws, regulations and rules that are relevant to its business. Slavery and human trafficking are totally unacceptable, and the business will not tolerate forced labour of any description within the company or in its supply chains. The business recognises its moral and legal responsibility to help prevent modern slavery and human trafficking and commit to taking robust and effective steps to ensure no such activities arise in the operation of the business. The aim of the business is to achieve the highest ethical standards in this regard and as a minimum, will comply with all relevant legislation. All employees of the company have a responsibility to be alert to the risks of modern slavery and human trafficking in their daily activities. With that in mind, employees are expected to report to management any concerns that an employee may have in this regard and managers are expected to act upon any concerns raised without delay. This statement sets out the action that the business has taken to identify, understand and address risks of modern slavery and human trafficking in its business and supply chains. It also sets out the steps put in place aimed at ensuring that there is no slavery or human trafficking in the business or supply chains.

Relevant Policies

Mitchell Drainage has in place the following policies that set out its approach to the identification and prevention of modern slavery and human trafficking within the business and its supply chains.

- **Ethical Trading & Code of Conduct Policy**

The business' commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within its supply chains is reflected within its Ethical Trading and Code of Conduct Policy. The business is committed to ensuring that its suppliers adhere to the highest ethical standards. Suppliers are required to demonstrate that they provide their workers with safe working conditions, treat them with dignity and respect, and act ethically and within the law in their use of labour. Serious breaches of the business' Ethical Trading and Code of Conduct Policy shall lead to the termination of the business relationship. The business' Ethical Trading and Code of Conduct Policy sets out the standard of ethical conduct that it expects from suppliers to the business. All suppliers are expected to adhere to the business' Ethical Trading and Code of Conduct Policy and to ensure that they comply with it, with major emphasis on areas which are to be considered to be at higher risk. The Ethical Trading and Code of Conduct Policy also sets out the implications for a supplier of acting in breach, including termination of the business relationship.

- **Whistleblowing Policy**

The business encourages all of its employees, workers, customers and other business partners to report any concerns related to activities within the business or in its supply chains. This includes any circumstances that may give rise to an increased risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.



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Due Diligence and Compliance

As part of the business' initiative to identify and mitigate risk, the business undertakes due diligence when considering working with potential new suppliers and regularly reviews the business' existing suppliers against the same criteria. The due diligence and reviews include:

- Assessing whether or not particular activities, countries or regions are high risk in relation to slavery or human trafficking by conducting supplier audits or assessments;
- Taking steps to improve any substandard supplier practices including the provision of advice to suppliers through the audit and assessment process and face to face meetings on supplier premises;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate the business' Ethical Trading and Code of Conduct Policy, including the termination of the business relationship; and
- Suppliers are requested to confirm in writing that they shall adhere to the business' Ethical Trading and Code of Conduct Policy.

Measuring Performance

In order to measure the business' effectiveness in ensuring that modern slavery and human trafficking is not taking place within its business or supply chains, it is:

- Continuing to adapt the system for supply chain verification whereby the organization evaluates potential suppliers before they enter the supply chain; and
- Conducting a review of its existing supply chains, expected to be completed within 2017, whereby the organisation evaluates all existing suppliers.

Training

The business requires that all key staff within our supply chain complete training on modern slavery to ensure that they understand the risks of modern slavery and human trafficking infiltrating the business or its supply chains.

At Mitchell Drainage and Environmental Solutions Ltd ("Mitchell Drainage"), we are committed to respecting human rights throughout our supply chain. We believe that everyone should be treated with respect and work in a safe environment. The Mitchell Drainage Ethical Trading Code of Conduct sets out the standards we expect our partners and suppliers to work towards. The Code is based on the Ethical Trading Initiative (ETI) Base Code which stems from international labour and human rights law. Mitchell Drainage will only work with reputable partners, suppliers and manufacturers who are committed to working towards compliance with the standards in the ETI Base Code set out below, both within their own operations and those of their suppliers.

As well as working to implement the ETI Base Code, and in line with the UK Modern Slavery Act 2015, we are committed to addressing any incidences of modern slavery within our supply chain. To this end, we pay special attention to the protection of foreign contract workers who may be potentially vulnerable to exploitation. Mitchell Drainage aims to ensure that all foreign workers retain passports, ID Cards, bankcards and similar documents to facilitate their unhindered freedom of movement, and we expect all of our suppliers and partners to follow this policy within their own operations and their own supply chains.



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1. Employment is freely chosen

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.



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5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers.

Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- This is allowed by national law;
- This is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- Appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

7. No discrimination is practiced

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.



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9. No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

Naomi Mitchell
Managing Director

Signed:

Date: 11/01/2023

A handwritten signature in black ink, appearing to be 'Naomi Mitchell', written over a horizontal line.