

ER-POL_18

Modern Slavery Policy

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Introduction

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The term 'modern slavery' is used to encapsulate the crimes of Slavery, Servitude, forced or compulsory labour and Human Trafficking (as explained below).

Slavery – the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ownership of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person.

Servitude – the obligation to provide services that is imposed by the use of coercion and includes the obligation of a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Human trafficking – requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel.

Our Approach

We operate a zero-tolerance approach to modern slavery and are committed to being transparent in our efforts to ensure modern slavery is not taking place in our business or supply chains.

We expect the same standards from our business partners, including suppliers, and will communicate and reinforce our zero-tolerance approach to modern slavery to them throughout our relationship. As part of our contracting processes, we include prohibitions against the use of modern slavery and conduct audits to ensure compliance. We also expect our business partners will hold their suppliers to the same standards.

This policy applies to all persons working for us or on our behalf in any capacity including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any of our employees' contract of employment.

We encourage openness about modern slavery issues and will support any person who raises genuine concerns under this policy in good faith – even if they eventually turn out to be mistaken.

The policy covers all of ER's activities and will be reviewed annually to ensure that it reflects current legislation and regulations.

The ER Directors have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

The Role of All ER Employees, Seconded and Contractors

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. As such you must notify your line manager as soon as possible if you have reason to believe, and do believe, that an incident of modern slavery has or is about to be perpetrated in our business or supply chains.

If you are concerned that the issues you have raised have not been adequately addressed by your line manager, you should follow the ER Whistleblowing policy as soon as possible. Similarly, if you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

Statute Law

The main areas of legislation appertaining to this policy are:-

- Modern Slavery Act 2015 section 54(1)
- Immigration, Asylum and Nationality Act 2006

Name: John Condon

Position: Director

Date: 18.1.22

Signature:

