



Business Management System

Tier 0

PD106 ERG PT Modern Slavery Policy

Modern Slavery Policy

Organisation

This policy applies to ERG Process Technologies Ltd and its subsidiaries (referred to in this statement as 'ERG PT').

ERG PT comprises four companies:

- ERG APC Process Technologies Ltd
- ERG (Air Pollution Control) Limited
- ERG APC Maintenance Limited
- ERG (Plastic Fabrication) Limited

The organisation is controlled by a Board of Directors.

Operational Bases

- ERG APC Process Technologies Ltd, ERG (Air Pollution Control) Ltd and ERG APC Maintenance Limited operate from:
 - Enterprise House, Foundry Lane, Horsham, West Sussex RH13 5PX.
- ERG (Plastic Fabrication) Limited operates from:
 - Whitebreads Farm, Stane Street, Slinfold, West Sussex RH13 0RE.

Definitions

ERG PT considers that modern slavery encompasses:

- Human trafficking;
- Forced Labour
- Debt Bondage
- Child Slavery
- Child Marriage
- Descent Based Slavery
- Domestic Slavery
- Slavery in supply chains

and that someone is in slavery if they are:

- Forced to work – through coercion, or mental or physical threat;
- Owned or controlled by an 'employer', through mental or physical abuse or the threat of abuse;
- Dehumanised, treated as a commodity or bought and sold as 'property';
- Physically constrained or have restrictions placed on their freedom of movement.



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Commitment

ERG PT acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. ERG PT understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

ERG PT does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. ERG PT strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

Steps

In accordance with section 54(4) of the Modern Slavery Act 2015, ERG PT undertakes due diligence on all suppliers to ensure that modern slavery is not taking place.

The due diligence processes on all suppliers includes a review of key policies and is subject to sign off by the Group Commercial Manager, Group Quality Manager and the appropriate Project Manager before any qualification of suppliers. Regular reviews of supplier arrangements are undertaken.

ERG PT has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery. Where such an instance is found to have occurred the relationship will be terminated immediately.

To ensure adherence to the ERG PT's commitments set out in this statement, ongoing monitoring of suppliers is undertaken ensuring reference is made to adherence to the Modern Slavery Act in supply contracts.

Slavery Compliance Officer

ERG PT has appointed the Group Commercial Manager as the Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action about ERG PT obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Signed:

Date: 16 / 1 / 2020

James Scott-Bowden
ERG PT Managing Director