

Anthesis (UK) Ltd

Modern Slavery and Human Trafficking Policy

Modern slavery has been legally abolished in most countries around the world but remains a real issue today. It affects businesses and supply chains across economies and sectors and generally relates to holding a person in servitude for the purpose of forced labour, sexual exploitation or arranging or facilitating human trafficking.

Anthesis modern slavery and human trafficking statements in this policy relates to section 54 of the Modern Slavery Act 2015 (“the Act”). We oppose slavery and human trafficking in all its forms and make this statement to set out the steps we have taken to ensure that slavery or human trafficking is not taking place in our business or in our supply chains.

The intention of this policy is to set out how Anthesis (UK) Ltd address modern slavery and human trafficking across its business and supply chain.

Although we are not required to make a modern slavery statement or policy under the Act, Anthesis is choosing to voluntarily comply as we believe it is incumbent upon all organisations to do what they can to tackle modern slavery and human trafficking.

(a) Structure and supply chains

Anthesis (UK) Ltd is a UK-based subsidiary of Anthesis Group, a global sustainability and solutions provider founded on the belief that commercial success and sustainability go hand in hand, and our own success is no exception. As a professional services firm, we also procure goods and services from third parties. This policy focuses on the key suppliers of our goods and services which is a part of our internal procurement function, and other business functions dealing with suppliers.

(b) Policies and governance

Anthesis (UK) Ltd has committed to respect and promote human rights and social principles in all our operations, including work with business partners and supply chains.

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.

Anthesis’ commitment is laid out in our **sustainability policy**, championed by our Chief Sustainability Officer, Paul Crewe. We strive to uphold human rights in accordance with the 1948 Universal Declaration of Human Rights and aim to implement responsible action according to the Guiding Principles for Business introduced by the UN Human Rights Council in 2011. We also support and follow the UK Government’s guidance for business to integrate human rights.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors,

suppliers and other business partners. We expect that our suppliers will hold their own suppliers to the same high standards.

(c) Ownership and responsibility

This policy is owned by the Executive Board of Anthesis Group and applies to all Anthesis (UK) Ltd employees, partners and suppliers.

The Board of Anthesis (UK) Ltd is responsible for implementing this policy, monitoring its use and effectiveness, and dealing with any queries about it.

(d) Risk Assessment and due diligence

Anthesis (UK) Ltd aims to tackle modern slavery and human trafficking across its business activities by identifying any existing issues or risks related to it as well as managing and mitigating those.

All of those working for us or under our control are responsible for preventing, detecting and reporting any existing or potential issues of modern slavery and human trafficking at Anthesis (UK) Ltd and across its supply chains. Employees and suppliers are encouraged to raise any concerns about any issues or suspicion of modern slavery within the Anthesis (UK) Ltd business operations or any tier of our supply chain as soon as they become aware of it.

Whilst we have not identified any occurrences of modern slavery, we have done risk assessments and have identified the following key processes to influence and manage any potential risk of modern slavery and human trafficking within our business and supply chains:

- Ensure other relevant policies are updated and aligned: Our Sustainable Procurement policy already covers modern slavery and we will update any related policies to include references to modern slavery and human trafficking.
- Continuous risk assessment: Our procurement function will continue to monitor our procurement spend on identified higher risk areas and suppliers, following an initial category and supplier risk evaluation.
- Scrutinise and monitor suppliers: Our procurement function, and other business functions dealing with suppliers, will carry out due diligence on specified higher risk suppliers to identify and manage potential risks related to modern slavery and human trafficking.
- Effective contract management: Our procurement function, and other business functions dealing with suppliers, will engage with specified higher risk suppliers and their supply chains to make them aware of this policy, and to jointly identify risks of modern slavery and human trafficking and mitigating actions.

We encourage everyone within the business to raise genuine concerns in good faith under this policy regardless of whether these may turn out to be mistaken. No members of staff may be punished, dismissed or be subject to any form of detriment for having taken an initiative that falls within the scope for the Whistleblowing procedures.

We will terminate our relationship with individuals, suppliers, and organisations working on our behalf who breach this policy.

(e) Communication and training

All new employees and temporary workers are made aware of this policy as part of the Anthesis (UK) Ltd induction process, and specific awareness training concerning modern slavery and human trafficking risks is provided.

Equally, this policy is communicated to all Anthesis (UK) Ltd suppliers, contractors and business partners at the start of a business relationship or renewal of a contract.

This policy is reviewed and, if required, updated on an annual basis.

Date: 16 February 2021



Paul Crewe, Executive Director & Chief Sustainability Officer

February 2023