

HUMAN TRAFFICKING AND MODERN SLAVERY STATEMENT 2022

Our Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes WCS Group's modern slavery and human trafficking statement for the calendar year ending 31 December 2022.

WCS Group are committed to ensuring modern slavery does not exist in its organisation or supply chains. We constantly strive to develop policy and procedures to manage the way we obtain our goods and services to keep our supply chains robust. To date we have had no reports of modern slavery within our organisation nor our supply chains.

Our Commitment

WCS Group commits to ensuring that human trafficking and forced labour are not used in any part of the life cycle of our organisation's ability to provide our services. We uphold International Human Rights' standards and offer our employees, customers, suppliers and other stakeholders respect.

This statement applies to all companies that are part of the WCS Group which includes WCS Environmental Ltd, WCS Services Ltd, Clearwater Technology Ltd, Tersus Consultancy Ltd, Kingfisher Environmental Services Ltd, Guardian Water Treatment Ltd, Atana Ltd

WCS Group is the trading name for WCS Environmental Ltd which is part of Marlowe Plc.,

Supply Chain

We remain focused on assessing our high risk spend areas and on raising awareness across all staff, from the Senior Leadership Team through to everyone within the business. We strive to ensure our products and services are sourced and supplied responsibly and ethically.

Our Contractors: We continue to assess the modern slavery standards of our key contractors having implemented in late 2020 more formal, risk-based supplier due diligence process. This process includes a questionnaire which covers their environmental and ethical credentials. The responses to these questions enable us to identify any supplier who falls short of meeting our requirements and we are committed to work with them so they can achieve our benchmark.

Our Suppliers: WCS Group assesses the modern slavery standards of our key suppliers and, in 2021, we will be launching a more formalised process to communicate the requirements we expect them to achieve in respect of modern slavery.

Staff's Wellbeing

We remain committed to ensuring human rights are respected within every part of our organisation and have the following key controls in place to ensure the wellbeing of our people is protected:

- Staff are aware of the company values that we expect them to uphold: respect, reliability, accountability and integrity. They are encouraged to report any concerns to their Line Manager to ensure the appropriate action is taken.
- We have a robust process of safeguarding our staff and customers and respond to any incident of safeguarding. We are all committed to keeping all our staff's safe from harm and abuse.
- We have a Whistleblowing policy, allowing staff to raise concerns confidentially.
- Staff have access to an Employee Assistance Programme which provides the staff with a secure way of seeking advice and sensitive matters personally affecting them and their families.
- As part of our recruitment process all staff have to demonstrate their eligibility to work in the UK. This is also a procedure any agencies we use for the placement of temporary staff.



Phil Greenwood

Chief Executive Officer

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Approved by: HR Director, J.Jackson

Usage: Internal Only

This policy applies to:

WCS Environmental Ltd., WCS Services Ltd., Clearwater Technology Ltd., Kingfisher Environmental Services, WPL, B&V Chemicals, Aquatreat & Atana