

Anti-Slavery and Human Trafficking Policy

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

The board of directors has overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under our control comply with it.

The Managing Director / Contract Manager has 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.

POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Best Environmental Solutions Ltd has a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings, relationships and to implementing, enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in business or in any of supply chains.

The Best Environmental Solutions Ltd is also committed to ensuring there is transparency in own business and in 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 Suppliers. As part of our contracting process, we include specific prohibitions against modern slavery, and we expect that our Suppliers will hold their own suppliers to the same high standards.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Best Environmental Solutions Ltd is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

SCOPE/TO WHOM THIS POLICY APPLIES

This policy applies to all persons working for the Best Environmental Solutions Ltd or on our behalf in any capacity, including employees at all levels, directors, managers, agency workers, seconded workers, volunteers, apprentices, agents, contractors, external consultants, third-party representatives, and business partners. This Policy does not form part of any employee’s contract of employment and the Best Environmental Solutions Ltd may amend it at any time.

The prevention, detection, and reporting of modern slavery in any part of the Best Environmental Solutions Ltd businesses and supply chains is the responsibility of all those working for it or under its control. Those working on the Best Environmental Solutions Ltd

behalf are required to avoid any activity that might lead to, or suggest, a breach of this Policy. You must notify Managing Director / Contract Manager of the Best Environmental Solutions Ltd if you believe or suspect that a conflict with this Policy has occurred or may occur in the future. Staff are encouraged to raise concerns about any modern slavery likely in any parts of the Company's supply chains in any supplier tier at the earliest possible stage.

COMPLIANCE WITH THIS POLICY

Best Environmental Solution Ltd is focus on prevention, detection and encouragement of reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for Best Environmental Solutions Ltd or under its control.

Everyone whom this policy applies:

- Ensure that you read, understand, and comply with this policy.
- Is required to avoid any activity that might lead to, or suggest, a breach of this policy.
- Must notify Managing Director / Contract Manager as soon as possible if believe or suspect that a conflict with this policy has occurred or may occur in the future.
- Is 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.
- If believe or suspect a breach of this policy has occurred or that it may occur, must notify Managing Director / Contract Manager, or may report it in accordance with our Whistleblowing Policy as soon as possible.
- 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 Managing Director / Contract Manager.

As part of our initiative to identify and mitigate risk we aim build long-standing relationships with local suppliers and make clear our expectations of business behaviour. Have a policy of "knowing our customer" to ensure that we are contracting with appropriate businesses. This is achieved by checking and approving our Suppliers Evaluation Questionnaire.

With regards to national or international supply chains, our point contact is preferably with a UK company or branch, and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain. We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

REPORTING

Best Environmental Solutions Ltd Staff and Suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to Managing Director/ Contract Manager.

Internal reporting is critical to the Best Environmental Solutions Ltd success, and it is both expected and valued.



All Employees and Suppliers are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that they become aware of. Complaints will be kept confidential and will be dealt with appropriately. No individual will experience retribution or retaliation for a complaint made in “good faith”. If a member of staff believes that a breach of this Policy has occurred or is likely to occur, they must notify Managing Director / Contract Manager as soon as possible. If the staff member is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Best Environmental Solutions Ltd supply chains constitutes any of the various forms of modern slavery, it should be raised with Managing Director / Contract Manager.

COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this Policy and on the risk our business faces from modern slavery in its supply chains will be provided annually (and as otherwise necessary). Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Everyone is invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to Managing Director / Contract Manager.

BREACHES OF THIS POLICY

Any employee who breaches this Policy by engaging in or conspires to engage in any modern slavery conduct or human trafficking will face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and if warranted legal proceedings may be brought against you. The Best Environmental Solutions Ltd may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this, Policy.

Signed by: Samuel Hunkin (Managing Director)

A handwritten signature in black ink, appearing to read 'S. Hunkin', is written over the signature line.

Date of Review: 25.10.2023

Date of Next Review: 25.10.2024