


Emerald Green Energy Ltd Integrated Management System		
Document Title:	Modern Slavery and Human Trafficking Procedure and Statement	
Ref. No.:	GDPP087	
Document Users / Security Class:	All Users	
Next Review Date	One Year	

Objective:

Modern slavery relates to the exploitation of children and adults in slavery servitude, or forced compulsory labour. Human Trafficking is the recruitment, movement, harbouring, or receiving of children and of adults through coercion, deception or force for the purposes of exploitation.

Modern slavery and human trafficking is primarily motivated by profit, with consumer demand for the services by provided by victims creating opportunities for exploitation.

Our firm is committed to driving out acts of modern-day slavery and human trafficking within its business and that from within its supply chain, including sub-contractors, and staff.

Within our organisation and as part of our commitments we want to:

- act transparently and disclose information about any modern slavery risks which we have identified and what actions we have taken in response to them
- targeting our actions where they can have the most impact by prioritising risks
- making year-on-year progress to address those risks and improve outcomes for workers in our business and supply chains

Scope:

Suppliers, Contractors, sub-contractors and staff.

Modern Slavery and Human Trafficking Procedure:

Statement:


Our firm acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within our organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain within our firm.

Our firm currently only sources its products and goods from within the UK and EU.

As part of our organisation’s due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored by the director of our firm.

We will encourage suppliers and contractors, and exercise influence, to adopt responsible business policies and practices including working towards eliminating modern slavery and human trafficking in supply chains.

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We will Communicate to our business partners and suppliers our commitment against modern slavery and human trafficking-related practices, (although we are not expected to guarantee that all our supply chains are “slavery free”).

Our company will not support or deal with any business knowingly involved in slavery or human trafficking and the company director/s and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chain.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request.

This policy statement will be reviewed annually and we will publish our modern slavery statement on our UK website, placing the link on a prominent place on the homepage and we will provide a copy of the statement in writing to anyone who requests one within 30 days of receiving the request.

This policy and statement take into account, and supports, the policies and procedures and requirements documented in our Quality Management System. The implementation and operation of this management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. This policy should be communicated to all levels of the company and it should be regularly reviewed by the director/s to ensure its continuing suitability and relevance to the company activities.

The aims of this policy and statement will be communicated to new staff upon joining and at annual staff reviews.

Who needs to publish a statement?


A commercial organisation is required to publish an annual statement if it:

- Is a “body corporate” or a partnership, wherever incorporated or formed
- Carries on a business, or part of a business, in the UK
- Supplies goods or services, and
- Has an annual turnover of £36 million or more

Organisations are responsible for determining whether the legislation applies to them.

Turnover

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“Total turnover” means the turnover of an organisation and any of its subsidiary undertakings (including those operating wholly outside the UK).

“Turnover” means the amount received from the provision of goods and services falling within the ordinary activities of the organisation or its subsidiary undertakings, after the deduction of:

- Trade discounts
- Value added tax
- Any other taxes

We confirm that we are a relevant commercial organisation as defined by Section 54 of the Modern Slavery Act 2015 and that we are compliant with annual reporting requirements contained in Section 54 of the Modern Slavery Act 2015.

The Modern Slavery Act 2015 imposes reporting obligations on all commercial organisations supplying goods or services which carry on their business or part of their business in the UK, and which have a total turnover exceeding £36 million in any financial year.

Our turnover does not exceed £36 million in any financial year.

Annual Review

This document will be reviewed at least on an annual basis.

Last Reviewed: 1st January 2026

Next Review Date: 1st January 2027

Name: Suliman Maroof


Signature: *Suliman Maroof*

Position: Director

Document Author:	David Mooney		
Document Approver:	Suliman Maroof	Controller:	SHEQ

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Version Number	Amendment	Date
1.0	New document	1 st January 2023
1.1	Document reviewed and added that we will encourage suppliers and contractors, and exercise influence, to adopt responsible business policies and practices including working towards eliminating modern slavery and human trafficking in supply chains and also, we will communicate to our business partners and suppliers our commitment against modern slavery and human trafficking-related practices.	1 st January 2024
1.2	Document reviewed and (1) Expanded our Objectives by adding a commitments section. (2) Extended section on who needs to publish a statement. (3) We will publish a statement on our website.	1 st January 2025
1.3	Document reviewed and (1) Expanded the “Objective” section by adding two new paragraphs from the NCA website describing what Modern Slavery and Human Trafficking is.	1 st January 2026