

Approved by: William Clarke,

Date: 11/02/2026 **Review:** Annually

Introduction

Direct Enviro Services Ltd (“DES”, “the Company”) has a zero-tolerance approach to modern slavery and human trafficking in any part of our business or supply chains. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to safeguard against any form of modern slavery.

This statement sets out our structure, policies, due diligence, risk assessment and mitigation activity, performance measures, and training relating to modern slavery and human trafficking.

Organisation structure, its business and its supply chains

Organisation & business

DES is a UK-based environmental and highways services company providing vegetation management, traffic management, surveys, EV charging deployment, depot services and associated site works. Our workforce comprises direct employees, multi-disciplinary crews, and site supervisors operating from regional depots. We undertake contracts for public and private sector clients including principal contractors and local authorities.

Supply chains

Our supply chains are tiered and include:

- Direct suppliers of plant, materials and consumables (e.g., safety equipment, aggregates, fuel, replacement parts and electrical components).
- Subcontractors and labour providers engaged to deliver site works (TM crews, arboriculture teams, specialist survey teams).
- Professional services (consultants, testing labs and occupational health providers).
- Logistics and plant hire companies.
- International manufacturers and distributors of equipment and components.

Suppliers range from large multi-nationals to small local businesses. Some goods and services are sourced globally.

Policies in relation to slavery and human trafficking

We maintain and operate the following policies and statements which underpin our approach:

- **Anti-Slavery & Human Trafficking Policy (standalone)** - declares zero tolerance and DES’s commitments to prevent, detect and remedy modern slavery.
- **Supplier Code of Conduct** - sets minimum social, labour and human-rights expectations, including prohibition on forced or bonded labour, child labour, unlawful deduction of wages, withholding of identity documents, excessive hours and unsafe working conditions.

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(Prepared in accordance with section 54, Modern Slavery Act 2015)

- **Procurement Policy** - requires risk-based supplier due diligence, contractual modern slavery clauses and escalation for high-risk suppliers.
- **Whistleblowing Policy** - enables confidential reporting of concerns, including modern slavery, with protection against retaliation.
- **Recruitment & Right to Work Policy** - requires verification of immigration and right-to-work documents, secure record keeping and direct employment contracts for all staff (no clandestine labour arrangements). **Equality & Dignity at Work Policy** and **Grievance Policy** — provide worker protections and routes to raise concerns.

Each policy is available to staff via our intranet and is reviewed regularly by SHEQ and HR.

Due diligence processes in relation to slavery and human trafficking

DES applies a risk-based due diligence approach across the business and supply chains:

Supplier onboarding & contracts

- All new suppliers complete a Supplier Pre-qualification Questionnaire (PQQ) which includes modern slavery questions (employment practices, use of labour agencies, subcontracting, worker welfare).
- Standard supplier contracts and purchase orders include express clauses prohibiting modern slavery, requiring compliance with DES's Supplier Code of Conduct, and granting DES audit/inspection rights.

Risk assessment & segmentation

- Suppliers and subcontractors are risk-rated by activity, geography and sector. Higher-risk categories (labour providers, low-skilled manual supply chains, suppliers in countries with higher prevalence of slavery) are subject to enhanced checks and audit.

Checks and verification

- For higher-risk suppliers we require copies of labour agency licences, payroll evidence, worker pay slips, insurance, accreditation and, where relevant, self-audit questionnaires.
- We verify right-to-work and identity for all new employees and require agencies to evidence compliance for supplied labour.

Site controls

- Contract clauses require use of named subcontractors only and that any change in subcontracting must be notified to DES for review.
- SHEQ and Procurement run periodic supplier performance reviews and site inspections (including review of worker welfare and conditions) for higher-risk suppliers.

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Incident & remediation

- If modern slavery risk or non-compliance is identified, we will suspend new work with the supplier, trigger escalation, require corrective action and remediation plans, and in serious cases terminate the relationship and notify authorities.

Parts of the business & supply chains where there is a risk and steps taken

Risk areas identified

- **Labour providers & subcontracted crews** (TM operatives, grounds/vegetation teams): risk of undocumented workers, poor employment practices, excessive hours, or withheld pay.
Low-skilled supply chains for consumables and materials sourced internationally: risk within overseas manufacturing or logistics tiers.
- **Transport & logistics**: risk of subcontracted drivers / third-party fleets using informal labour.
- **Temporary or emergency hires** and seasonal peak labour: risk from rapid procurement without adequate checks.

Steps taken to assess & manage risk

- Prioritised supplier mapping and risk-rating by Procurement.
- Enhanced due diligence for labour providers including documented evidence of payroll, contracts, VAT/Company registration, and interviews with workers during on-site audits.
- Contractual protections and audit rights embedded into subcontracts and purchase orders.
- Regular site welfare checks and toolbox talks that include worker rights and reporting routes.
- Collaboration with prime contractors and clients to align standards and share audit findings.
- Inclusion of modern slavery clauses in major procurement tenders and evaluation criteria.
- Use of Tier-1 supplier audits and targeted third-party audits for overseas manufacturing where warranted.

Effectiveness & performance indicators

We measure the effectiveness of our approach using the following performance indicators and governance checks:

Key Performance Indicators (KPIs) (examples & targets)

- **% of active suppliers with modern slavery clauses in contract** — target: 100% for new agreements; maintain 95%+ for existing suppliers.
- **% of high-risk suppliers completed due diligence / audit** — target: 100% of high-risk suppliers assessed within 6 months of onboarding.
- **Number of site supplier audits** conducted per year (target: increase year-on-year).
- **Number of welfare interviews / worker voice checks** conducted during audits.
- **% of Procurement team & Supply Chain leads trained** in modern slavery due diligence — target: 100% within 12 months.
- **Number of modern slavery incidents reported / investigated** and remediation actioned — target: transparent reporting, and remedial action within agreed timescales.
- **Right-to-work checks**: 100% compliance for new hires.

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Monitoring & Governance

- Monthly Procurement & SHEQ review of supplier risk dashboards and audit outcomes.
- Annual Board review of Modern Slavery Statement, KPIs and remediation outcomes.
- Use of third-party audits and supplier corrective action plans to close identified gaps.

We will publish progress and update the statement annually.

Training & capacity building

We provide targeted training to build capability and awareness across DES:

Mandatory training

Procurement & Contracting staff: modern slavery risks, how to conduct supplier due diligence, contract clauses and audit triggers.

- **HR & Recruitment teams:** right-to-work checks, spotting indicators of exploitation, confidentiality and referral to SHEQ/OH.
- **Site Managers / SHEQ / Supervisors:** recognising signs of exploitation, undertaking welfare interviews, immediate management actions and escalation.
- **All employees (annual refresher):** awareness training covering what modern slavery is, how to spot it, how to report concerns and the Company whistleblowing process.

Training delivery & materials

- E-learning modules for general staff (mandatory), live workshops for Procurement / HR, and practical toolkits for site supervisors (checklists, interview scripts).
- Toolbox talks for site crews to explain worker rights, contact points and how to report issues confidentially.
- Supplier workshops and induction requirements for key suppliers to explain expectations and reporting obligations.

Remediation & Worker-centred approach

Where instances of modern slavery, exploitation or poor labour practices are found, DES will seek to remediate and protect the worker(s), including: immediate safeguarding (remove worker to safety), cooperation with authorities, requiring supplier corrective actions, and, where appropriate, supporting access to remedy in line with the UN Guiding Principles on Business and Human Rights. We prioritise voluntary remediation and improvement programmes but will terminate relationships where suppliers fail to remedy serious breaches.

Approval & next steps

This statement is approved by the Board and will be reviewed at least annually. Over the next 12 months DES will:

- Complete a full risk map of Tier-1 and selected Tier-2 suppliers.
- Deliver mandatory training to Procurement, HR and all site supervisors.
- Execute targeted audits of high-risk labour providers; and
- Publish progress against the KPIs above in our next annual statement.

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Signed:

William Clarke, Director

Direct Enviro Services Ltd 11/02/2026