



Global Policy
Modern Slavery Mitigation

Policy No.: 1.14 (Version 2.0)
Issue Date: 01 July 2026
Applies to (Region): All
Applies to (Department): Procurement, Product Supply
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1. Policy Statement

Envu is committed to acting ethically and with integrity in all its business dealings and relationships.

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, forced or compulsory labor, 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.

Envu strictly prohibits the use of Modern Slavery in any form within its operations or supply chains. Envu recognises the responsibility it shares with its suppliers and business partners to operate ethically and to identify, mitigate, and eradicate risks of human rights violations.

Envu is fully committed to continuously improving its systems, controls, and governance frameworks to ensure that Modern Slavery and human rights violations do not occur in any of its operations or supply chains.

To support this commitment, Envu expects its suppliers to uphold equivalent standards within their own operations and supply chains, as set out in the [Envu Supplier Code of Conduct # 1.08](#). Envu requires its suppliers to implement appropriate policies, controls, processes, and ethical business practices.

Envu monitors supplier compliance with this Policy, with a particular focus on high-risk suppliers, through the use of a supplier sustainability and ethical assessment managed by EcoVadis. These assessments support risk management and continuous improvement and require suppliers to provide evidence of their business practices, policies, and controls relating to Modern Slavery and human rights.

Envu is fully committed to complying with all applicable laws, in accordance with the principles of the International Labor Organization, the UN Global Compact and the UN Universal Declaration of Human Rights.

This Policy outlines Envu's approach to preventing and mitigating Modern Slavery in its supply chain and the obligations on staff and suppliers.

2. What Is Modern Slavery

Modern Slavery is the term used to encompass the act of taking away someone's freedom and depriving them of their liberty in order to exploit them for personal or commercial gain. It covers the following terms:

Forced labor is where the person is made to work against their own free will, whereby they cannot leave without penalty or the threat of penalty. The threat is not always related to violence and can be in the form of loss of rights or privileges, withholding passports or identity papers or the threat of denunciation to immigration authorities.

Human Trafficking ¹

Trafficking in persons, or human trafficking, can lead to forced labor or slavery. This is the act of "recruitment, transportation, transfer, harbouring or receipt of persons by means of the

¹ Defined in the United Nations Convention against Transnational Organized Crime Protocol to Prevent, Suppress and Punish Trafficking in Persons Article 3, paragraph (a).

threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.”

When trafficking leads to forced labor, people are tricked, deceived or coerced into travelling to a job that either never existed or, if it did, the terms and conditions were not as stated. It is important to note that:

- The victim may consent to the travel, for example in cases where they are deceived by the promise of a better life or job or where a child is influenced to travel by an adult
- Travel needs not be cross border but may be within the same country
- The exploitation of the potential victim does not need to have taken place – simply that the movement of the individual was with a view to exploiting them.

Bonded labor

Also known as debt-induced forced labor and debt bondage. This involves the taking of a loan or an advance of wages by a worker from an employer or labor recruiter in return for which the worker pledges his or her labor and sometimes that of family members to pay back the loan. Debts may be passed onto the next generation.²

Child Labor

Child labor is defined by international standards as children below 12 years working in economic activities, those aged 12-14 engaged in more than light work, and all children engaged in the worst forms of child labor (ILO).

‘Child Labor’ is often referred to as work that deprives children of their childhood, their potential and their dignity and that is harmful to physical and mental wellbeing and development. The type of ‘work’, the child’s age, hours of work, conditions that they work in, and the objectives and laws of the country it is carried out in determine if it can be considered as ‘child labor’.

Identifying behaviours constituting Modern Slavery

Identifying victims of Modern Slavery can be challenging due to the different ways that the crime can manifest itself. There is a spectrum of abuse and therefore it can be hard to tell when poor working practices and conditions, lack of health and safety awareness fall into Modern Slavery. Therefore, whilst some actions might not be clearly identified as Modern Slavery under the law, businesses have a responsibility to ensure that the workers in their supply chain are not exploited, that they are safe and that their employment (hours and wage), health and safety and human rights laws and international standards are adhered to.

3. Who Does This Policy Apply To?

This Policy applies globally to all persons working for, or on behalf of Envu, in any capacity. This includes employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, sub-contractors and suppliers.

² International Labor Organisation, *Combating Forced Labor, A Handbook for Employers and Business*, 2015
http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_101171.pdf

4. Obligations And Compliance With This Policy

All employees or persons working for, or on behalf of Envu, who manage supplier relationships on behalf of Envu must:

- Read, understand, and comply with this Policy
- Undertake all training on Modern Slavery when requested
- Uphold the spirit of this Policy

If a risk or incident is identified:

Employees are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of the business or supply chains (of any supplier tier) at the earliest possible stage. If an employee believes or suspects a breach of this Policy has occurred or that it may occur, they must notify their line manager or Procurement at Envu.procurement@Envu.com

In addition, any suspicion of Modern Slavery in Envu supply chains should also be sent to Procurement at Envu.procurement@Envu.com to be investigated.

Business owners and contract managers within all countries and business areas should be aware of the level of modern slavery risk within their own supply chains and ensure they contact Procurement if they believe any of their suppliers carry a high risk of Modern Slavery.

Receipt and Ownership of cases: All concerns received via the Procurement mailbox are automatically assigned to:

- Procurement Category Manager responsible for the relevant supplier/category
- If unclear: Chief Procurement Officer assigns ownership within two (2) working days

A preliminary assessment is conducted by the assigned Procurement Manager, supported by the Sustainability team (if required) and Legal and Compliance (for high-risk cases).

Initial assessment must be completed within five (5) working days of notification. Based on the initial assessment, the case is categorized as:

- Unsubstantiated (closed with documentation)
- Requires further investigation
- Critical / Immediate escalation required

Investigation Process: The investigation process is led by Procurement, with cross-functional support from Sustainability, Legal and Compliance, and Supply Chain (if operational implications) teams. The team may take the following actions to investigate the issue:

- Supplier engagement and clarification
- Requesting audits or third-party assessments
- Reviewing certifications and compliance documentation
- On-site inspections (if necessary)

For standard cases the investigation process is completed within thirty (30) working days and for complex cases the timeline may extend, with documented justification and interim updates every ten (10) working days.

If Modern Slavery is confirmed in the supply chain, then this will be added to the **Procurement Risk Register**.

Escalation Framework: Immediate escalation is required when modern slavery is confirmed or highly likely, there is significant reputational, legal, or ethical risk and where the supplier fails to cooperate.

The following roles must be informed:

- Chief Procurement Officer (CPO)
- Chief Sustainability Officer (CSO)
- Chief Supply Chain Officer (CSCO)
- General Counsel

Consideration will then be given as to whether Envu should terminate or give the supplier the opportunity to remedy the situation.

5. Compliance Process

5.1 Process For Identification of High-Risk Suppliers

The compliance process will focus on any suppliers determined to be high-risk in relation to Modern Slavery.

There are two (2) key dimensions that will determine whether a supplier shall be considered high-risk and the subsequent classification of the potential risk:

- Category: there are certain industries where Modern Slavery is more prevalent, particularly unskilled and irregular work or seasonal work that requires a large intake of staff. These sectors include cleaning, catering, hospitality, clothing and uniforms, temporary recruitment (blue collar work), and manufacturing (for full details of categories please see [Appendix 1](#)).
- Annual spend with the supplier: spends help prioritize suppliers' assessment, with greater focus on suppliers that Envu places a significant amount of business with.

These criteria are applied cumulatively, with category risk determining the baseline risk level and spend used to prioritise assessment and monitoring efforts. This ensures a consistent and risk-based approach across the supplier base.

Regional adaptations may be made only by Procurement to reflect specific local market conditions (e.g., higher-risk labor practices in certain countries or sectors). Such adaptations may include:

- Adjusting how categories are classified in a specific region
- Refining spend thresholds for prioritization

Any regional adjustments reflecting local market conditions must be approved by the Chief Procurement Officer.

The business must work with Procurement to ensure that all identified suppliers are given a risk classification.

Suppliers categorised as high-risk will be assessed via Envu's Ecovadis Platform. This is an evidence-based assessment that assesses the supplier across a range of sustainability criteria and provides an overall score. The supplier must pay for their own audit. Envu expects suppliers to show that they are improving upon their ethical standards and activities each year.

Alternatively, suppliers can prove adherence to a suitable alternative Sustainability accreditation, or undertake a desktop assessment led by a member of Envu's Sustainability function.

5.2 Compliance Process For New Suppliers

Once a supplier is selected as part of the Envu sourcing policy, then the category of goods must be established to ascertain the potential risk of Modern Slavery.

Suppliers categorised as potentially high-risk, as per the Envu Modern Slavery Risk Model, will be instructed to complete an assessment managed by EcoVadis ("EcoVadis Assessment"). This should ideally be done before the supplier contract is signed, but as a minimum within six (6) months of contract start.

If the supplier does not agree to complete an EcoVadis Assessment or provide evidence of an equivalent standard or via a desktop assessment, this will be captured as a risk and escalated to the Chief Procurement Officer.

Following escalation, a **case-by-case decision** is taken based on the supplier's risk level (category, location, and business criticality). Possible outcomes include:

- **Engagement and remediation (preferred option):** The supplier is formally re-engaged, informed of Envu requirements, and given a defined timeframe to comply. Support or clarification may be provided where appropriate.
- **Risk acceptance with mitigation:** In limited cases (e.g. strategic or hard-to-replace suppliers), the risk may be temporarily accepted, subject to **enhanced monitoring**, alternative evidence, or interim controls.
- **Restriction of business activities:** The supplier may be restricted from participating in new tenders or receiving additional business until compliance requirements are met.
- **Suspension or termination:** Where the supplier remains non-compliant or presents a high Modern Slavery risk, Envu may suspend or terminate the business relationship, in line with contractual terms.

All decisions are documented, justified, and monitored by Procurement, with involvement from **Sustainability and Legal** where required.

If the supplier's score from the EcoVadis Assessment is below the required Envu minimum level of 30, then the supplier must submit and complete a Corrective Action Plan within a mutually agreed time frame. This will also be logged as a risk by Procurement, and the Corrective Action Plan will be tracked and followed up by Procurement and the business owner or contract manager.

If the supplier is unwilling and/or unable to implement suitable remedies, a decision must be made as to whether to terminate the supplier contract. Sign off from the Chief Procurement Officer and the Chief Sustainability Officer will be required if the supplier is to continue providing services to Envu.

All new suppliers must sign up to the [Envu Supplier Code of Conduct # 1.08](#) and a programme is being run to that all critical suppliers have accepted the Code of Conduct and that all suppliers have received the Code of Conduct.

5.3 Compliance Process for Existing Contracts

- Procurement will identify High Risk existing suppliers who should be assessed for Modern Slavery. These will be prioritized and then assessed in order.
- The process will be carried out in line with the process for New Suppliers.

Please see the Envu Modern Slavery Mitigation Process Maps (shown in [Appendix 2](#)) for the full process.

6. Suppliers' Obligations

All suppliers are expected to operate in accordance with the [Envu Supplier Code of Conduct # 1.08](#). Suppliers must:

- Sign up to and uphold the principles in the [Envu Supplier Code of Conduct # 1.08](#), and provide evidence of such where necessary
- Agree to sign up to an audit platform that Envu decides to use, and to cover the cost of such membership if Envu deems them to be a high-risk supplier in terms of Modern Slavery
- Allow Envu to audit their sites (including external third-party audits) where requested and be transparent and honest during all site visits
- Carry out their own audits of sites on a frequent basis and report any important findings to Envu
- Ensure they manage their own supply chain in line with Envu and legislative guidelines
- Report to Envu, as soon as reasonably possible, any cases of Modern Slavery in their own businesses or supply chains

7. Breach Of This Policy

Every effort should be made by employees to read and understand this Policy. Should any aspect not be clear, requests for clarifications shall be sent to Envu.procurement@Envu.com. The support of everyone is critical to the success of this important programme.

Employees shall comply with this Policy and its associated procedures and processes.

Non-compliance may result in disciplinary actions. Envu Management reserves the right to apply any sanctions that it deems appropriate based on the circumstances of the case and in accordance with applicable laws, up to and including dismissal. Any non-compliance may impact the performance reviews of the concerned employee.

Envu may terminate its relationship with any third party acting on its behalf if they breach this Policy.

8. Roles & Responsibilities

Envu Chief Procurement Officer owns this Policy, which has been reviewed and signed off by the Chief Sustainability officer. Procurement will review the Policy and its associated

procedures and processes annually to ensure they are effective in meeting legislative and ethical standards.

Roles and responsibilities of concerned functions:

- **Procurement**
 - Leads supplier risk classification and maintains the risk framework
 - Ensures all relevant suppliers are assessed and categorized
 - Supports the business in identifying and managing high-risk suppliers
- **Business Owners and Contract Managers**
 - Are accountable for understanding the risk profile of their suppliers
 - Must collaborate with Procurement to ensure suppliers are classified
 - Are responsible for notifying Procurement if a supplier is suspected of presenting a high Modern Slavery risk

It is the responsibility of the business units to ensure that they comply with this Policy. Whilst Procurement and other support functions will provide support and guidance, business owners and contract managers must ensure that they and their suppliers comply with this Policy, and that they maintain a zero-tolerance approach to Modern Slavery within their supply chains.

Management at all levels are responsible for ensuring their team members understand and comply with this Policy and undertake any required training.

Any deviation to this Policy must be formally requested, appropriately justified, approved by the Chief Procurement Officer and Chief Sustainability Officer, and documented in the risk register.

9. Compliance and Effectiveness Monitoring

Effectiveness is measured by how well these processes are implemented and whether they successfully identify, mitigate, and address Modern Slavery risks in practice.

To ensure this, Procurement establishes and tracks a set of key performance indicators (KPIs), including but not limited to:

- Percentage of suppliers getting assessed by Ecovadis
- Coverage of high-risk suppliers subject to enhanced due diligence
- Completion rate of supplier Code of Conduct acceptance
- Number and resolution time of Modern Slavery cases identified
- Implementation and closure of corrective action plans

Procurement reviews these indicators on a regular basis (at least annually) and reports outcomes to relevant governance bodies. Where gaps or weaknesses are identified, Procurement is responsible for defining and implementing improvement actions, including updates to processes, tools, or supplier engagement strategies.

10. References

Envu Global Policy - Supplier Code of Conduct # 1.08

Envu Global Policy - Procurement Management # 2.05

Envu Global Policy - ESG / Sustainability # 3.05

11. Version History

Revision	Effective Date	Description of Change
1.0	16 August 2023	Creation of the document
2.0	01 July 2026	Strengthened governance and oversight (including dual CPO/CSO approval, exception management, and risk register); clarified roles and scope; enhanced supplier due diligence process (EcoVadis-based risk assessment and escalation framework)

Appendix 1: High Risk Categories

Actives, Raw Materials and Intermediates
Finished Goods
Third Party Licensing
Formulation Materials
Packaging
Liquid
Others (TL)
Ready Baits (RB)
Solid
Fleet
IT Hardware
Logistics ¹
Sample Logistic
Forestry
Packaging Services
Property Management Services
Engineering Services
Equipment
Facility Management
MRO
Utility Supply

Appendix 2: Envu Modern Slavery Mitigation Process Maps

