



Modern Slavery Statement 2024

Eco Verde Energy

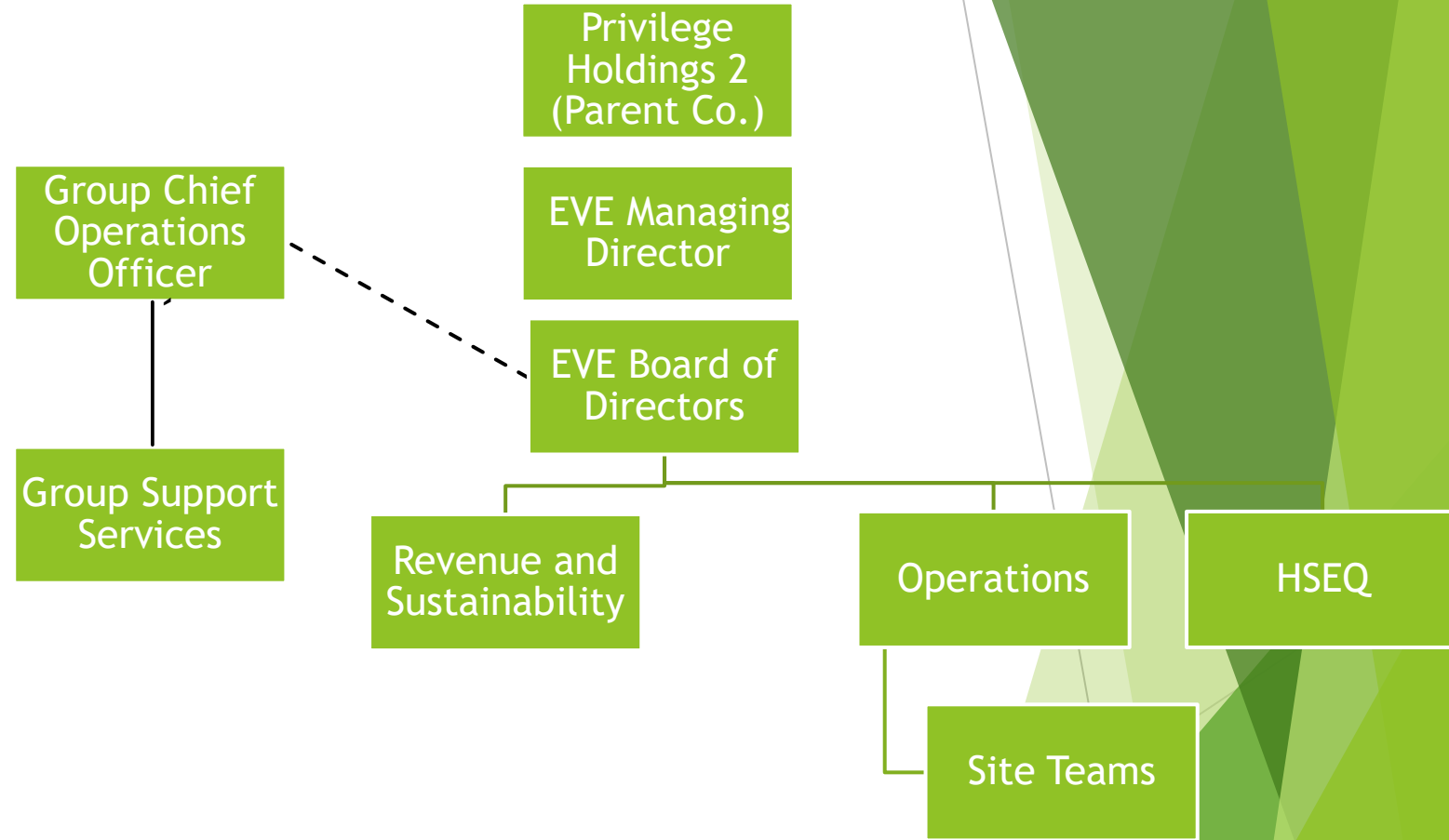
1. Organisation Structure

Eco Verde Energy Limited (EVE) provides Operations and Management Services for Anaerobic Digestion Plants.

It is part of the PH2 Ltd Holdings Company.

As of November 2024, EVE employs a total of 56 full time staff and 0 part time staff. 0 casual labour has been employed. 7 additional operational staff are employed through other Limited Companies in the PH Group.

A number of goods and services are sub contracted through trusted suppliers. EVE have adopted an Approved Suppliers approach to monitor and maintain supplier performance, inclusive of actions taken to prevent modern slavery.



2. Company Policies

Eco Verde Energy (EVE) ensures that it meets the holdings company group policy requirements for Modern Slavery Act compliance.

Associated HR policies contract of employment terms, contracts for the supply of goods and services are regularly reviewed to ensure legal compliance and best practice.

- EVE's financial year runs from Jan-Dec. For the financial year 2023, EVE turned over less than £36 million.
- This statement will be published on the Eco Verde Website, signed as approved by the Board of Directors and reviewed annually, (July 2025)
- This Statement is to be sent to the Modern Slavery Register as part of the duties of the Parent Company

Modern Slavery Policy

This policy also relates to all related and subsidiary companies in Privilege Holdings Limited and Privilege Holdings 2 Limited groups, known as 'Privilege' within this policy.

1. Policy Statement

This policy relates to all staff (*meaning permanent, fixed term, temporary staff, directors and any third party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with the Privilege Holdings groups in the UK or overseas as well as suppliers*) within the organisation and has been created to ensure that staff deal with the area that this policy relates to in accordance with legal, regulatory, contractual and business expectations and requirements.

As some companies within the groups have annual turnovers exceeding £36m they have been identified as being legally required to publish a modern slavery statement declaring its initiatives to avoid and/or eliminate modern slavery, both directly and among its suppliers.

Privilege strictly prohibits the use of modern slavery and human trafficking in its operations and supply chain. Privilege have been and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within its organisation or in any of its supply chains. Privilege expects that its suppliers will hold their own suppliers to the same high standards.

1. Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Privilege is a company that expects everyone working with it or on its behalf to support and uphold the following measures to safeguard against modern slavery:

- Privilege has a zero-tolerance approach to modern slavery in its organisation and its supply chains.
- The prevention, detection and reporting of modern slavery in any part of its organisation or supply chain is the responsibility of all those working for Privilege or on its behalf.
- Enabling employees and persons associated with the Privilege to understand the risks associated with Modern Slavery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing.
- Provide suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with.
- Maintain an effective framework for dealing with any suspected instances of Modern Slavery.

3. Due Diligence Processes

In 2024, EVE has taking the following steps in relation to slavery and human trafficking in its business and supply chains;

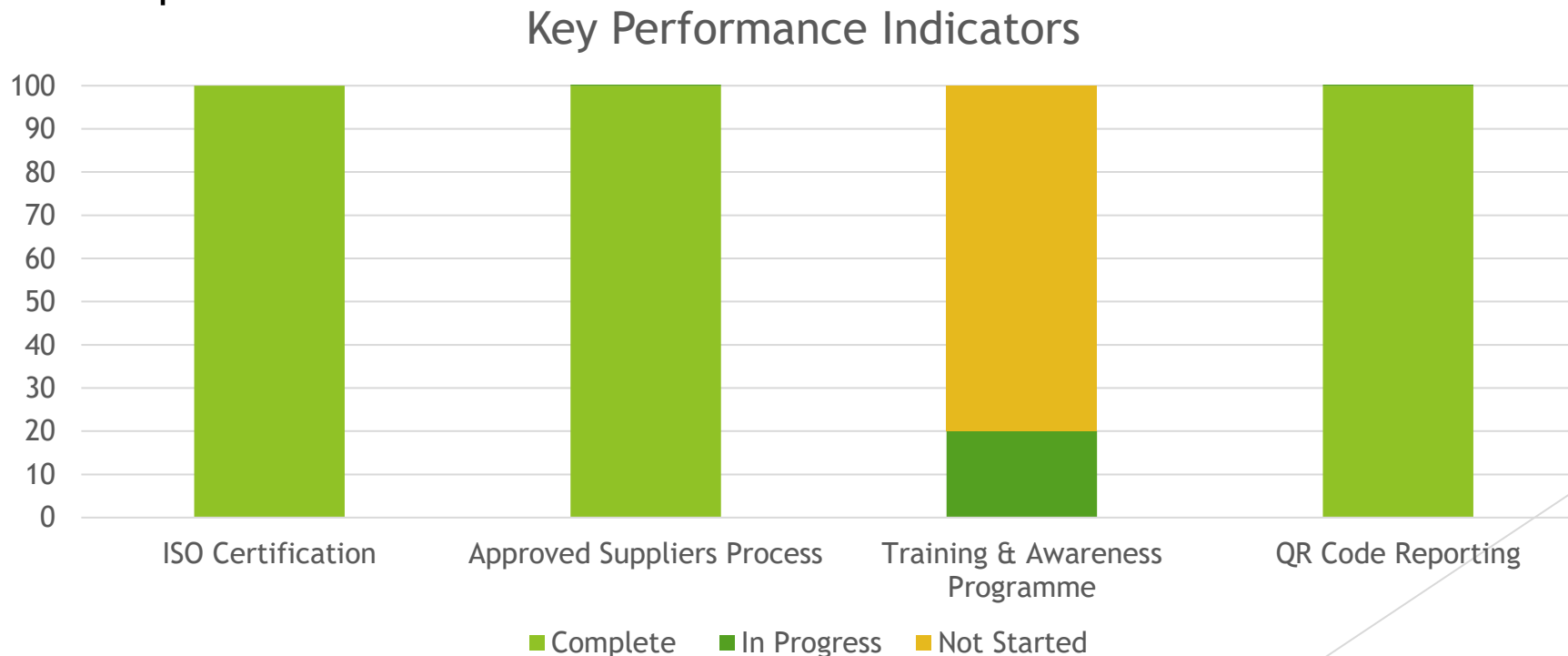
- Maintaining UKAS certification to ISO 9001, 14001 and 45001. This will ensure capture of procurement and supply chain modern slavery issues by confirmation of 1st tier suppliers of goods and services, that there is no modern slavery in their supply chains. Certification to these standards was achieved in October 2023.
- An aspiration to enable social responsibility auditing of these suppliers, if deemed necessary and where a high risk is identified.
- A programme of awareness training for all EVE staff has been identified for completion in Q4 2024.
- Site staff, visitors and contractors have access to a QR code based reporting tool which can be used to report issues or concerns within the organisation. These issues are investigated by the management team to ensure adequate resolution.
- An annual review of procurement policies are undertaken to ensure accuracy of goods and services used by Eco Verde Energy Limited. This will be undertaken in Q4 2024.

4. Modern Slavery Business Risk Assessment

Hazard/Potential Harm	Persons Who could be Harmed and How	Existing Controls	Additional Planned Controls to Reduce Risk	Risk Evaluation H/M/L
Criminal Exploitation	Potential use of casual labour on sites during peak periods. 2 nd party (suppliers of labour) exploited due to being part of organized crime or unregistered gangmasters.	• 3rd Party audited management system, • Approved Supplier Questionnaires • Checks on contract terms and arrangements.	• Staff training and Awareness • Audit of key suppliers of services and associated stakeholders. • Reporting and escalation procedures	Low
Labour Exploitation (Operations)	Ensure that persons are not being forced to work by 3 rd parties i.e others controlling finances, freedom of movement - especially for workers originally from overseas.	• Fair contract of employment terms • Employee appraisals • Pro-active HR checks and balances	• Staff training and Awareness • Reporting and escalation procedures	Low
Labour Exploitation (Supply Chain)	Tier 1 suppliers supply chain where goods are sourced internationally or where items such as PPE, uniform and consumables are produced in this country.	• 3rd Party audited management system, • Approved Supplier Questionnaires	• Staff training and Awareness • Social audit of key suppliers • Reporting and escalation procedures	Medium

5. Key Performance Indicators

- Implementation and 3rd party certification to ISO 9001 14001 and 45001 standards in 2024. - Completed.
- Implementation of Approved Suppliers Process and questionnaire for tier 1 suppliers. - Completed.
- Training and Awareness Programme initiated. Determination of appropriate and relevant training and roll out to staff. - In progress
- QR code reporting mechanism setup for modern slavery reporting or concerns. - Completed.



6. Training and Awareness

Training

Training materiel to be created to identify the specific examples of where modern slavery could exist, with applicable examples demonstrated to staff.

Information

Posters and reporting mechanisms have been displayed at all sites to inform of what action to take should an issue of exploitation of modern slavery be identified.

Awareness Campaigns

All sites will be issued with briefings on spotting the signs and reporting on incidents or issues which may be examples of modern slavery or exploitation.

7. Approval

Reviewed By:

Name: W Rogers

Signed:



Position: HSEQ Director

Date: November 2024

Approved By:

Name: D Bullen

Signed:



Position: Managing Director

Date: November 2024