

Modern Slavery and Human Trafficking Policy

Invicta Environmental Ltd

Document ID	BMS008	**Revision**	003
Status	Approved	**Policy owner**	Chris Smith Managing Director
Approved by	Norman Smith Director	**Approval date**	1 September 2026
Start date	1 September 2026	**End date**	31 August 2027
Last updated	29 October 2026	**Review due**	31 August 2027

Commitment and scope

Invicta Environmental Ltd prohibits slavery, servitude, forced or compulsory labour and human trafficking in its operations and supply chains. This policy applies to directors, workers, recruitment providers, suppliers and contractors acting for us. It sets ongoing controls and is separate from a financial-year transparency statement.

Risk and due diligence

Norman Smith will coordinate a documented assessment of labour and supply chain risks. Factors include recruitment methods and fees, withheld documents or wages, coercion, accommodation dependency, opaque subcontracting and weak worker protections. Nationality alone must not be treated as evidence of wrongdoing or used to discriminate.

Before engagement, managers will make proportionate checks on identity, ownership, employment arrangements, recruitment providers and the ability to meet legal and ethical standards. Higher risks require enhanced evidence and follow-up, including worker engagement where safe. A declaration alone is not conclusive evidence. Procurement contracts will prohibit exploitation and provide proportionate audit, remediation and suspension rights.

Workers must retain access to their identity documents, receive lawful pay and understandable terms, and be able to raise concerns without retaliation. Checks and audits will be recorded and reviewed when the supplier, work or risk changes.

Concerns and response

Report indicators promptly to Norman Smith or Chris Smith; an alternative manager may be used where one is implicated. Do not confront suspected traffickers or undertake an investigation that puts anyone at risk. Where there is immediate danger, call emergency services. Management will obtain safeguarding and legal advice, support affected people and make required referrals or reports. Remediation must consider worker welfare before abruptly terminating a supplier relationship.

BMS011 protects people who raise concerns. Training will explain warning signs, reporting and the limits of staff responsibilities. Records will be handled securely and shared only where lawful and necessary.

Annual transparency requirements

Management will assess annually whether section 54 of the Modern Slavery Act 2015 applies, including the £36 million turnover threshold and other statutory criteria. If applicable, a separate statement must accurately describe steps taken during the relevant financial year, obtain board approval and director sign-off, and be published as required.

Review and communication

This policy covers 1 September 2026 to 31 August 2027. It will be reviewed by 31 August 2027, sooner following legal or operational change, incidents or evidence of ineffective controls. Relevant changes will be communicated and superseded copies removed from use.

Approved by Norman Smith, Director

Signature  Date 1 September 2026