

ECONORTH LTD.

# Modern Slavery

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## Policy

John Thompson

Next Review Date: 11.02.26



**This policy applies to all EcoNorth Staff / Internships / Consultants / Placements who work on behalf of EcoNorth and is reviewed annually to ensure its continuing suitability.**

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## Modern Slavery Policy

### 1. Purpose, Scope and Users

EcoNorth has a zero-tolerance approach to modern slavery. As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains, in line with our obligations under the Modern Slavery Act 2015.

This policy applies to all EcoNorth's officers, employees, subcontractors, suppliers, contractors and other business partners.

This policy does not form part of any employee's contract of employment and EcoNorth may amend it at any time.

### 2. Reference Documents

- Modern Slavery Act 2015.

### 3. Definitions

"EcoNorth" or "we" or "us" or "our" means "EcoNorth Ltd".

"Modern slavery" is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of one person's liberty by another in order to exploit that person for personal and/or commercial gain.

### 4. Responsibilities

The Executive Director has overall responsibility for ensuring compliance with this policy.

Senior Managers have day to day responsibility for implementing this policy, dealing with queries about it, monitoring its use and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Line Managers are responsible for ensuring those reporting to them understand and comply with this policy and are given training on it, and the issue of modern slavery in supply chains, where necessary.

### 5. Commitments

EcoNorth is committed to the following:

- All officers and employees must read, understand and comply with this policy.

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- The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for EcoNorth or under our control. All officers and employees are required to avoid any activity that might lead to, or suggest, non-compliance of this policy.
- Employees must immediately notify the Executive Director (or, in his absence, a Senior Manager) if it is known or suspected that non-compliance with this policy has occurred or may occur in the future in any part of our business or supply chain of any supplier.
- EcoNorth encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery is or may be taking place in any part of our business or our supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes they have suffered any such treatment, they should raise it formally using the Grievance Procedure, which is found in the Staff Handbook.
- Due diligence will be conducted, as part of EcoNorth's contracting processes, to ensure that our suppliers, subcontractors and contractors comply with this policy, or their own policy of the same nature, and hold their own suppliers, subcontractors and contractors to the same high standards.

## 6. Suspected Incidents of Modern Slavery

- If an EcoNorth employee, subcontractor, client, supplier or visitor suspects that modern slavery is occurring at EcoNorth or in our supply chain then it should be reported immediately.
  - ~ In an emergency and if someone is in danger, 999 should be called for police assistance.
  - ~ If the incident is less urgent, the police should be notified on 101 or the modern slavery helpline on 08000 121 700 or [www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org).
  - ~ The Executive Director (or another Senior Manager in their absence) should be informed.
- Priority should be given to safeguarding the victim from further harm and providing them with appropriate support.
- Relevant third parties should be informed of the suspected modern slavery eg the client or project manager.
- An internal investigation should be held, led by the Executive Director, to identify what happened and when, how and why it occurred and who was involved.

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- The company's policies and procedures should be reviewed and corrective actions should be agreed to ensure the incident does not happen again.
- All details of the incident and investigation should be documented.
- Lessons learned and planned changes to the company's policies and procedures should be shared with the whole team. The Board should be informed at the next Board meeting or sooner if appropriate.
- Corrective actions should be fully implemented and documented.
- The Executive Director and/or relevant other employees will be expected to cooperate fully with any criminal investigation which may take place.

## 7. Communication and Awareness of This Policy

Training on this policy, and on the risks our business faces from modern slavery in our business and our supply chain, will be provided to all employees.

EcoNorth's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the onset of our business relationship with them and reinforced as appropriate thereafter.

## 8. Non-Compliance

Any employee who fails to comply with this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

EcoNorth will terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.

## 9. Policy Review

EcoNorth's Modern Slavery Policy is reviewed annually, or earlier if there are changes to applicable legislation or the company. Any amendments that are made at these times will be shared with EcoNorth's team.



John Thompson  
Executive Director  
14.02.25