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## Modern Slavery Transparency Statement 2022-23

### 1. Introduction

EcoNorth is fully committed to ensuring that our business implements and enforces effective systems and controls to prevent modern slavery taking place anywhere in our business or in our supply chain.

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 them for personal and/or commercial gain.

This statement is made in accordance with the Modern Slavery Act 2015. It sets out the steps taken by EcoNorth during the financial year 2022-23 to understand the potential risks to our business from modern slavery and to prevent modern slavery in our business and supply chain.

### 2. Organisation Structure, Business and Supply Chain

This statement covers the activities of EcoNorth Ltd, which has a registered office in Cramlington, Northumberland, UK. EcoNorth is a subsidiary of Northumberland Wildlife Trust, which is based in Gosforth, Northumberland, UK. EcoNorth's divisional office, EcoÉireann, is based in Dublin, Ireland.

EcoNorth is an ecological consultancy providing ecology surveys, assessments, information, advice and guidance regarding wildlife and their habitats for both development and conservation projects throughout the UK and Ireland. We reinvest our profits back into local conservation through our relationship with Northumberland Wildlife Trust, genuinely adding value to the consultancy work we deliver.

Our supply chain primarily comprises of individuals and organisations based in the UK and Europe. We spend in the region of £200k per year on the procurement of goods and services. Key categories of spend include:

- Subcontractors and contractors.
- PPE and other safety equipment.
- Ecology and arboricultural equipment.
- Travel services, particularly hotel accommodation.
- Consumables and office equipment.
- IT hardware, software and software licences.
- Training, from internal and external providers.
- Professional services and advice.

### 3. Policies in Relation to Modern Slavery

EcoNorth has implemented the following policies to prevent modern slavery in our operations and supply chain.

- Modern Slavery Policy.
- Equality, Diversity and Inclusion Policy.
- Ethical and Environmental Procurement Policy.

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- Anti-Bribery, Corruption and Financial Crimes Policy.
- Staff Handbook, including Whistleblowing Policy.
- Corporate Social Responsibility Policy.

These policies are reviewed at least annually and are shared with all employees, as well as our subcontractors and contractors where relevant. They are also uploaded to our company websites and client portals.

#### 4. Risk Assessment and Due Diligence Processes

##### Within our own operations

EcoNorth's exposure to risk within our own operations is deemed to be low. We have a number of policies and processes in place to ensure that our employees are not exploited and that they have a safe and supportive working environment.

- We maintain a modern slavery policy which is reviewed at least annually and approved by the Board. All employees are required to confirm they have read and understood this policy when they join the company and following updates to the policy.
- We set annual objectives, targets and KPIs aimed at preventing modern slavery.
- We communicate with employees and business associates through periodic meetings and sharing of relevant company documents on our websites.
- All job adverts for new employees include reference to EcoNorth's policy of promoting equal opportunities, diversity and inclusion.
- We only recruit highly skilled employees who are required to provide references and proof of their achievements.
- We only employ reputable recruitment agencies to support our recruitment needs. Recruitment costs are deemed to be a business cost paid for by EcoNorth.
- All employees have a written contract of employment that sets out the rights and obligations arising from their employment, including appropriate working hours and breaks, pay and overtime rates, deductions (if any), holiday and sick pay entitlements, and the notice period needed for them to terminate their contract and leave our employment. Employees are free to serve notice at any time.
- We carry out robust verification of each employee's identity and ongoing right to work in the UK and/or Ireland.
- We never withhold any employee's identity documents or passport during their employment.
- We comply with or provide enhanced versions of all legislation in respect of working time and statutory time off, holiday entitlement, sickness and maternity/paternity/shared parental/adoption leave and minimum rest breaks and periods.
- All of our lower paid employees receive at least the Real Living Wage. We ensure that employees' wages are paid directly into their own bank account and monthly pay slips are provided as standard.
- We provide employees with relevant PPE for their role which is paid for by EcoNorth.
- We respect the right of individual employees to join a trade union.
- All employees are required to undertake modern slavery training during their induction and beyond.
- All employees and business associates are encouraged to report any concerns related to the direct activities or the supply chain of the organisation, including any circumstances that may give rise to an enhanced risk of modern slavery. EcoNorth's grievance and whistleblowing policies are designed to make it easy for all workers to make disclosures, without fear of retaliation.
- We employ external auditors to perform our financial checks.

To date, EcoNorth has not had any instances of an employee reporting a suspected case of modern slavery within our company.

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### Within our supply chain

EcoNorth recognises that our supply chain represents the greatest risk for modern slavery, though our exposure to risk is deemed to be low.

We undertake robust due diligence before engaging new suppliers and periodically review our existing supply chain. Our due diligence processes include:

- New subcontractors and contractors are required to complete an assessment form confirming that either they have their own modern slavery policy and procedures in place or they agree to adhere to EcoNorth's policy and procedures.
- New subcontractor and contractor agreements include modern slavery terms and conditions.
- All new suppliers undergo a basic risk assessment. Those who are considered to be a medium or high risk to the business undergo more stringent checks, in line with our Due Diligence Procedure.
- Wherever possible, goods and services are procured from existing and trusted suppliers who are included on our Approved Supplier List, which is reviewed at least annually.
- Any breach of modern slavery legislation by a subcontractor or contractor will result in termination of EcoNorth's business relationship and/or contract with that party.

EcoNorth has not directly noted or been informed of any instances of modern slavery across our supply chain.

## **5. Key Performance Indicators to Measure the Effectiveness of Steps Taken in 2022**

EcoNorth introduced the following key performance indicators for 2022:

- Continue to conduct modern slavery due diligence as part of our contract management activities:
  - 100% of new subcontractors and contractors sign up to EcoNorth's current modern slavery policies and procedures or provide evidence of following their own.
- Continue to raise awareness amongst employees of modern slavery:
  - 100% of new EcoNorth employees will complete an online modern slavery training module within the first six weeks of employment.
  - Arrange an employee event promoting modern slavery reporting procedures.

The indicators and activities were reviewed during the year and deemed to be comprehensively completed.

## **6. Action Plan for 2023**

In 2023, in addition to continuing the work outlined above, we will focus in particular on the following:

- Arrange an event for employees and subcontractors to raise awareness of modern slavery.
- Include reference to the company's commitment to modern slavery prevention in all job adverts.
- Verify the age of all new employees via robust documentation checks when they join the organisation. All employees must be over the age of eighteen.
- Develop our modern slavery policy to deal effectively with suspected or confirmed incidents of modern slavery in our business or supply chain including the provision of support to their victims.

The indicators and activities will be reviewed during the year.

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## 7. Training on Modern Slavery

To ensure a high level of understanding of modern slavery, training is part of EcoNorth's induction process for all new employees. All employees are educated to understand what modern slavery is, to recognise the risks of it in our business and supply chain, and are encouraged to report any suspicions of modern slavery.

## 8. Board Approval

EcoNorth's Board has approved this statement for the financial year 2022-23.



John Thompson  
Executive Director  
17.02.23