



ATG group

Modern Slavery & Human Trafficking Statement

Updated 03/01/2024



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1.0 Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the calendar year 1st January 2024 to 31st December 2024.

The statement sets down ATG Group's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

2.0 Organisational Structure and Supply Chains

This statement covers the business activities of ATG Group which are as follows:

- Environmental remediation
- Site waste management
- Invasive species removal/management
- Oil and chemical spill response
- Groundworks (Scotland only)
- Spill care product supply to Northern and Republic of Ireland

The Company currently operates in the following countries:

- Northern Ireland
- Republic of Ireland
- Scotland
- England
- Latvia

The following is the process by which the Company assesses whether activities or countries are high risk in relation to modern slavery or human trafficking:

- Each new supplier or subcontractor are pre-screened via a "Pre-qualification Questionnaire" to determine their level of management systems and accreditations
- Any potential countries are explored through research and where applicable, advice is sought from external management or business consultants
- Where applicable, any potential suppliers or contractors will be asked to provide their Modern Slavery and Human Trafficking Statements prior to engaging with them
- Accreditation systems such as Alitus and Constructionline will be used where possible to pre-screen that the companies ATG Group work with contain the applicable policies or statements

3.0 High Risk Activities

None of the Company's activities are currently deemed to be of high risk in relation to Human Trafficking or Modern Slavery.

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** The HR & Compliance Manager is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting to the needs of the Company
- **Risk assessments:** The IMS Team are responsible for risk assessments in respect of human rights and modern slavery by making an active decision on concerns highlighted by Project Managers
- **Due diligence:** Project Managers are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking, they should highlight concerns to the IMS Team

4.0 Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Whistleblowing policy - The Company encourages all its workers, customers, and other business partners to report any concerns related to its direct activities or its supply chains
- Employee handbook - The handbook sets down the actions and behaviour expected of employees when representing the Company
- Corporate Social Responsibility (CSR) Policy - The Company's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities

5.0 Due Diligence Process

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier.

6.0 Review

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Management Team and HR endorse this policy statement and is fully committed to its implementation.