

The Greentown Companies strive to have the highest possible standards in all aspects of our business, including respecting human rights and ensuring that all individuals are treated with dignity and respect. This Policy sets out our commitment and the steps we take to meet our responsibilities to respect internationally recognised human rights standards. It is guided by the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Greentown comply with all legislative and regulatory requirements within both Northern Ireland and the Republic of Ireland along with applicable international laws.

This Policy provides the basis for embedding responsibilities to respect human rights throughout all our businesses functions and applies not only to Greentown and to its employees, but to our sub-contractor companies also.

### Diversity, Inclusion and Equal Opportunities

Greentown is committed to promoting equal opportunities in the workplace. Every job applicant, employee or worker will be treated fairly and equally, with dignity and respect, regardless of their age, disability, religious belief, political opinion, sex, sexual orientation, marital or civil partner status, gender reassignment, pregnancy or maternity, race, colour, social class, nationality, ethnic or national origin, trade union membership or any other protected characteristic.

The Greentown Equal Opportunities Policy ("**the EO Policy**") sets out its approach to equal opportunities and the avoidance of discrimination in the workplace. The EO Policy applies to all aspects of employment, including recruitment, pay and conditions of employment, training, promotion, conduct at work, disciplinary and grievance procedures, and the termination of employment.

At Greentown, we believe that our employees have the right to be treated with dignity. We are committed to providing a working environment free from harassment and bullying behaviour and ensure all employees are treated and treat others, with dignity and respect. We have sound policies in place which allow any employee who is concerned regarding their treatment, to raise concerns which will be thoroughly investigated, and appropriate action taken where deemed necessary.

### Health, Safety and Hygiene in the Workplace

We are committed to ensuring the highest standards for health and safety of employees and those affected by our business activities, and to providing a safe and suitable environment for our employees both whilst on site and in our premises.

Our Health and Safety Policy sets out our arrangements in relation to:

- Assessment and control of health and safety risks arising from our business activities.
- Preventing accidents and work-related ill-health.
- Consultation with employees on matters affecting their health and safety.

- Provision and maintenance of a safe workplace, and the equipment and tools.
- Information, instruction, training and supervision in safe working methods and procedures.
- Emergency procedures in cases of fire or other major incidents.

All employees share the responsibility of achieving safe working conditions and we are committed to engaging with employees to continually review and improve health and safety across our operations. Employees are provided with appropriate training and are required to be vigilant in the care of their own health, that of their colleagues, clients, and members of the public. Our employees are required to observe safety rules and adhere to their training in the safe use of equipment and tools.

Employees are also required to report any health and safety concerns immediately and to co-operate on health and safety matters, including the investigation of any incident.

### Forced Labour, Human Trafficking and Child Labour

Greentown is not statutorily required to publish a Statement as it does not satisfy the turnover requirements under the Modern Slavery Act 2015 (“**the Act**”) however Greentown is committed to the spirit of the Act and will comply with it.

We believe that the risk of slavery within our business is low, however, we remain vigilant and cautious in our approach.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that forced labour or modern slavery is not taking place within our business.

Greentown carries out robust pre-employment checks to ensure that all our employees are eligible to work in the UK, and their “identity documents” are photocopied and return to the individual immediately. Employees are free to leave their employment with Greentown, after providing their contractual notice period or by mutual agreement.

Greentown does not employ anyone under the age of 18 years of age (unless employed as part of an apprenticeship scheme where the minimum age will be 16 years of age), and there are robust processes and systems in place to ensure this is the case.

### Treatment of Workers

Physical abuse, the threat of physical abuse, verbal abuse, violence, sexual or other harassment, bullying or other forms of intimidation are prohibited. Greentown has arrangements in place to allow employees to raise their concerns which will be thoroughly investigated, and appropriate action taken in circumstances where any employee has been found to have acted in an unacceptable way.

### Wages, Benefits and Working Hours

Greentown issue newly appointed employees with a written Contract of Employment which details the terms and conditions of their employment.

We have Pay Policies in place, competitive to our industries and labour market. We fully comply with the National Minimum Wage and National Living Wage requirements, and an annual pay review takes place to ensure that employees' wages are consistent to meet their basic needs and provide discretionary income. Each employee receives a wage slip at the end of every pay period, detailing the hours worked, the rate of payment for each hour worked, including enhanced rates of payment for night work or overtime, and detailing the statutory and any other deductions which apply to their wage. In accordance with employment law, Greentown applies no deductions to any employee's wage unless the terms of the deduction have been agreed with the employee in advance of the deduction.

Deduction from basic wage as a disciplinary measure is not permitted by Greentown.

The working hours are defined in the employee's Contract of Employment. Employees may be offered additional hours or overtime as required due to operational needs.

However, there is no obligation on employees to accept the additional hours or overtime. Employees are given the option of "opting out" of the Working Time Regulations, but this decision is a voluntary decision. Overtime is allocated responsibly considering the requirements of the Working Time Directive, both in terms of the hours worked each week and the amount of daily and weekly rest received by the employee.

Greentown do not use Fixed Term (Temporary) Contracts; however, Greentown do engage a small number of workers on Zero Hours Contracts. These workers are engaged on a "casual" or ad hoc basis, with no obligation to accept hours worked by Greentown. The use of workers on Zero Hours Contracts is monitored by the Human Resources Manager to ensure that these workers are engaged appropriately in line with employment law.

### Our Supply Chain

Many of our clients are within the public sector and therefore our works and services are publicly procured through tendering portals which ensures a transparent and fair procurement process.

Greentown aims to work with preferred suppliers who we have a history of working with successfully. We review our preferred suppliers regularly. Our subcontracting arrangements require pre-qualification and verification checks to ensure competence and compliance.

All of our suppliers, regardless of size, spend or geographic region, must comply with Greentown's policies and procedures. Greentown undertakes due diligence on all suppliers in advance of entering into contractual arrangements.

We categorise our suppliers as follows:

**Direct:** These are suppliers of raw materials without which we could not provide our services and principally include fuel (including electricity), pesticides and other weed control products.

**Indirect:** These are suppliers and providers of goods, services and facilities which assist in the operation of our business and include labour,

**Capital:** These are suppliers of capital items which we purchase for our business including: fixed and mobile plant, buildings, and other operating machinery.

The majority of our goods and services are sourced from within the UK and Republic of Ireland.

There have been no prior instances of any suppliers within our supply chain identifying any issues in respect of slavery. Greentown acknowledges that this does not mean that modern slavery cannot occur in our supply chain, and we continue to monitor information provided by our suppliers to ensure compliance. If any supplier is found to be in breach of this policy, it shall be treated as a breach of contract.

This statement has been approved by the directors of Greentown and will be subject to annual review.

## Modern Slavery and Human Trafficking Statement

### Introduction

This is the Modern Slavery and Human Trafficking Statement ("**Statement**") of the Greentown Companies (Greentown Environmental Limited and Greentown Traffic Management Limited (collectively "**Greentown**"). This Statement sets out the controls and processes that Greentown has in place to ensure that modern slavery and human trafficking do not take place in our supply chain, or in any part of our business.

Greentown is not statutorily required to publish a Statement as it does not satisfy the turnover requirements under the Modern Slavery Act 2015 ("**the Act**") however Greentown is committed to the spirit of the Act and expects all of its entities to comply with it even those entities operating outside the remit of the Act's territorial jurisdiction (UK).

Greentown believe that the risk of slavery within our business is low, however, we remain vigilant and cautious in our approach.

### Our Business, structure and supply chains

Greentown consists of three separate entities: Greentown Environmental Limited ("**GTE**") and Greentown Traffic Management ("**GTM**") in Northern Ireland and Greentown Environmental Limited ("**GTE ROI**") in the Republic of Ireland. Greentown provides environmental maintenance works and traffic management services to both the public and private sectors throughout Northern Ireland and the Republic of Ireland. We employ approximately 150 staff and engage a minimal number of subcontractors to support our business operations.

### Ensuring Modern Slavery does not take place in Greentown

Greentown's shareholders, directors, officers, and employees are expected to uphold and demonstrate integrity, inclusion and leadership in their actions and behaviours. We manage our employees openly, honestly, and fairly and aim to behave always as a responsible employer. We continuously seek to provide a skilled, trained, and competent workforce.

Greentown has various policies and procedures in place including an equal opportunities policy, health and safety policy and environmental policy. We are continually monitor quality standards and are externally audited for ISO certification purposes. In addition, Greentown has a whistleblowing policy available to all employees and compliance is regularly reviewed. Alongside induction talks, training is provided regularly on ethical behaviour in the workplace and supply chain. All employees are aware of the Act and its basic principles. Greentown encourages its employees and contractors to report any ethical violations (including any instances of slavery, suspected or otherwise) anywhere in the business or supply chain. All relevant employees are expected to comply with anti-bribery and competition law. In addition, Greentown management have an open-door policy to encourage conversations. The HR team supports employees in this regard also.

Greentown prohibit illegal and/or unethical behaviour by any supplier which would include any instance of modern slavery. Greentown does not currently operate in any high-risk industries or geographic areas. Greentown is committed to ensuring that all of our employees and contractors are paid fairly for the work that they complete and comply with both the National Minimum Wage and National Living Wage requirements.

### Ensuring Modern Slavery does not take place in our supply chain

Many of our clients are within the public sector and therefore our works and services are publicly procurement through the eTenders NI portal which ensures a transparent and fair procurement process. Greentown seeks that all of its clients comply with the Act as required. Greentown aims to work with preferred suppliers who we have a history of working with successfully. We review our preferred suppliers regularly. Our subcontracting arrangements require pre-qualification and verification checks to ensure competence and compliance.

All of our suppliers, regardless of size, spend or geographic region, must comply with Greentown's policies and procedures. Greentown undertakes due diligence on all suppliers in advance of entering into contractual arrangements.

We categorise our suppliers as follows:

**Direct:** These are suppliers of raw materials without which we could not provide our services and principally include fuel (including electricity), pesticides and other weed control products.

**Indirect:** These are suppliers and providers of goods, services and facilities which assist in the operation of our business and include labour.

**Capital:** These are suppliers of capital items which we purchase for our business including: fixed and mobile plant, buildings, and other operating machinery.

The majority of our goods and services are sourced from within the UK and Republic of Ireland. There have been no prior instances of any suppliers within our supply chain identifying any issues in respect of slavery. Greentown acknowledges that this does not mean that modern slavery cannot occur in our supply chain and we continue to monitor information provided by our suppliers to ensure compliance. If any supplier is found to be in breach of this policy, it shall be treated as a breach of contract.

## Equal Opportunities Policy

### Introduction

The aim of this policy is to communicate the commitment of Greentown Environmental Ltd to the promotion of equality of opportunity in the Company. We are committed to the highest standard of employment practices, we ensure selection based only on qualification, merit, and experience. We will offer employment opportunities to people regardless of gender, gender reassignment, political opinion, marital status, sexual orientation, or disability or on the grounds of race, colour, religion or belief or national origin.

We recognise that the provision of equal opportunities in the workplace is not only good management practice, but it also makes sound business sense. Our equal opportunities policy will help all employees to develop to their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of Greentown Environmental Ltd.

When recruiting and retaining employees with disabilities we will make good use of the practical information available and where necessary seek advice from disability agencies and the Department of Employment and Learning.

The Company will achieve these aims by strict adherence to the merit principle in its employment policies, procedures, and practices.

Under this policy we will review periodically our recruitment and selection criteria and procedures whether relating to initial appointment or subsequent promotion to ensure that all decisions are based on fair and consistent criteria which relate to ability and job performance.

### Implementation

Every employee has a personal responsibility for the implementation of this policy. Training and guidance will be delivered periodically to those key decision-makers, including managers and supervisors, and those involved in the recruitment process. The policy also applies equally to the treatment of customers, clients, and members of the public. Greentown Environmental Ltd will regard breaches of this policy as misconduct, which may result in disciplinary action under the Company's disciplinary procedure.

### Monitoring and Review

The Company will monitor and review the application of its policies and procedures to ensure that there is equity in the application of these and we will also monitor our workforce composition and undertake periodic review as required by Article 55 of the Fair Employment and Treatment Order (NI) Act 1998.

### Complaints

Employees who believe that they have suffered any form of less favourable treatment, including discrimination, harassment or victimisation are entitled to raise the matter either through the grievance procedure, as detailed in section 32 of the Employee Handbook or through the Company's Bullying and Harassment Policy, at section 44.