



ERP UK VOLUNTARY SLAVERY AND HUMAN TRAFFICKING STATEMENT– April 2020

ERP UK LIMITED is making a voluntary modern slavery and human trafficking statement relating to section 54 of the Modern Slavery Act 2015.

We oppose slavery and human trafficking in all its forms and make this statement to set out the steps we have taken to date, and those we will be taking in the current financial year, to ensure that there is no slavery or human trafficking in our business or in our supply chains.

ABOUT US

ERP UK is part of the Landbell Group and is the subsidiary operating in the UK.

Headquartered in Mainz (Germany), the Landbell Group is active on the European market and quickly expanding overseas. We have a unique international offering of services for:

- compliance with Extended Producer Responsibility legislation which requires the manufacturers or importers of Electrical and electronic appliances, batteries and accumulators and packaging to finance and organise the end of life of their products (collection and recycling); and
- software and consulting solutions in the Circular Economy field.

While our central and local teams have organised the treatment of millions of tons of waste, we have no recycling facility or transport vehicles of our own and thus partner with treatment facilities and logistic companies worldwide to serve our customers.

Through its core environmental business, the Landbell Group strives to have a positive impact on the world we live in. This includes our work for a more Circular Economy, and a strong commitment and firm position in support of Human Rights and Social Rights of workers. Modern slavery, as defined in the Modern Slavery Act 2015, may for instance include slavery, servitude, forced and compulsory labour and human trafficking.

ERP UK's annual turnover is under £36 million. Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act.2015, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to tackle modern slavery and human trafficking in our business and in our supply chains.

SUPPLY CHAINS

ERP UK contracts with third parties to provide goods and services to fulfil its own compliance obligations and its obligations to its members and customers. In particular, ERP mainly contracts with suppliers for the following goods and services:

waste collection operations; waste recycling operations; consultancy; office services including cleaning, security and utilities; IT equipment, software and support; marketing and design; printing; office supplies; food, drink and catering; legal services; insurance services; other professional services; recruiting; training services; accommodation and travel; couriers.



ERP is looking at ways in which it can work with key suppliers to present a united front to tackle slavery and human trafficking. This will be reflected in fixed term supplier contracts which are being put out to tender in Autumn 2019.

OUR COMMITMENT TO ETHICAL TRADING

ERP UK is committed to ethical trading principles and to ensuring that its supply chains are free from human trafficking and slavery. Modern slavery and human trafficking are complex problems, with multiple social and economic drivers and ERP UK is taking the time necessary to fully understand best practice with respect to this difficult issue.

Moving forwards, preventing slavery and human trafficking will be an important consideration when procuring new suppliers and renewing existing contracts. In addition, the ERP UK is working to identify the further steps it can take to ensure that no supplier in its supply chain utilises slave labour or engages (or is complicit in) human trafficking.

DUE DILIGENCE AND RISK ASSESSMENT

Where ERP UK uses contract workers, it engages such workers through reputable employment agencies or businesses that are committed to compliance with the anti-slavery and human trafficking legislation. In addition, to help identify and monitor the risk of slavery and human trafficking in our supply chain ERP UK is currently:

- reviewing and implementing a new procurement policy ensuring that all those involved in procuring and renewing contracts are aware of the Landbell and ERP UK stance on slavery and human trafficking;
- carrying out a review to identify and mitigate the risk of slavery and human trafficking in ERP UK supply chains;
- amending the ERP UK standard terms of business to include anti-slavery and human tracking provisions which require suppliers to comply with all anti-slavery and human trafficking legislation;
- providing compulsory training to managers and staff on slavery and human trafficking legislation and identifying risk factors;
- implementing a new whistleblowing policy; and
- requiring prospective suppliers and those seeking renewal of contracts to sign a declaration that they do not endorse, enable or facilitate (or are otherwise aware of) human trafficking or modern slavery in their businesses and their own supply chains.

EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

ERP UK is taking the time necessary to fully understand best practice in measuring how effective ERP UK has been at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. The following key performance indicators (KPIs) are amongst those being considered for inclusion in ERP UK's policies and procedures going forward:

- The percentage of suppliers and sub-contractors vetted for ethical labour practices.
- The number of inspections of direct suppliers and sub-contractors in our supply chains in the past year.
- The number of reported breaches in the past year.



- Percentage of staff receiving training on identifying and addressing the risk of slavery and human trafficking in our business and supply chains.

TRAINING

As a part of ERP UK's commitment to tackling slavery and human trafficking, ERP UK will look into the ways it can best prepare its staff to identify risks and manage suspected incidents of human trafficking and slavery. Training will help our employees and other staff members to ensure that ERP's suppliers are not utilising, facilitating or endorsing slave or trafficked labour. Through its contracts, ERP UK will also require its business partners to provide similar training to their staff.

REPORTING AND WHISTLEBLOWING

ERP UK aims to foster a culture and provide a framework for employees and other staff to feel comfortable to report any concerns surrounding slavery and human trafficking in the UK and elsewhere. ERP UK already has a whistleblowing policy and is considering how best to amend this to implement a zero-tolerance approach to slavery and human trafficking.

If ERP UK identifies any instances of modern slavery or human trafficking in the UK, whether in its own supply chain or otherwise, it will report this to the police without delay. If a potential incident of slavery or human trafficking is identified overseas, ERP UK will take such steps as are necessary in the circumstances, considering always which approach will produce the safest outcome for potential victims.

FURTHER STEPS

Year on year, ERP UK is committed to conducting a review of the effectiveness of the steps taken that year to ensure that there is no slavery or human trafficking in our supply chains.

Where ERP UK through Landbell has commercial and economic influence over its suppliers, ERP UK is committed to using such influence to encourage suppliers to comply with its goal of eradicating slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ERP UK's Slavery and Human Trafficking Statement for the 2019/2020 financial year.

Signature:



Policy owner: John Redmayne
Position: General Manager
Policy Review: Annual