

Modern Slavery and Human Trafficking Statement

EMCOR UK requires the highest standard of business conduct in its relationships with customers, supply chain partners and employees and strives to carry out its business in accordance with the highest ethical standards. The company is committed to operating its business in a manner that ensures the absence of slavery and human trafficking in its operations and supply chain.

EMCOR UK offers a comprehensive range of hard and soft facilities management services to our private business and public sector customers in the UK. These include mechanical and electrical maintenance, project management, estates maintenance, security guarding, cleaning, catering and waste management services. To deliver these services, we employ our own resources as well as working with a range of suppliers.

Policies

As part of our commitment to combatting modern slavery, EMCOR UK has implemented the following policies, which are reviewed and updated annually:

- Supply Chain Charter, which requires all our supply chain partners to conduct business in a lawful and ethical manner. All supply chain partners sign up to this charter as part of our supplier onboarding process in accepting our trading terms and conditions. As a partner in the Supply Chain Sustainability School, EMCOR UK works with the School and other Partners in developing a consistent approach to the modern slavery across the FM industry.
- Modern Slavery Policy, which sets out how modern slavery is relevant to us and the procedures we have in place as part of our commitment to combat modern slavery.
- Code of Business Conduct and Ethics, which sets out the behaviours we expect from employees in their dealings with colleagues, customers, supply chain partners and others. All employees are expected to act with integrity and follow these standards of behaviour.
- Whistleblowing Policy, which aims to encourage employees to report any suspected wrongdoing in the knowledge that their concerns will be taken seriously and investigated appropriately with their confidentiality respected.
- Recruitment and employment policies, which align to UK employment legislation ensuring employee rights are safeguarded.

The Executive Leadership Team takes overall responsibility for implementing these policies and provides adequate resources to monitor our risk and control measures, which aim to ensure that slavery and human trafficking is not taking place either within the company or our supply chains.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, EMCOR UK has adopted the following due diligence procedures:

- As part of our tender process, we ask potential supply chain partners to provide detailed responses relating to labour standards in their own organisation, and that of their supply chain, and to provide a chain of custody for materials and products, where applicable.
- As part of our onboarding process, all supply chain partners are required to certify compliance with UK legislation and regulations, including the Modern Slavery Act 2015, as part of our supply chain partner evaluation process.

- As part of our risk-based approach, we carry out periodic audits of suppliers identified as higher risk, including certain construction, cleaning and security providers.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers

Assessing and Managing Risk

EMCOR UK's business activity is undertaken predominantly within the UK. The nature of professional and technical services provided to our customers limits the potential risk of slavery and human trafficking within the business, our supply chain and business partners. The nature of our facilities management support services, in particular construction, security, cleaning and catering, are considered to be higher risk. Our due diligence, audit programme and clear business policies and procedures mitigate the risk of slavery and human trafficking within our organisation.

We expect all those in our supply chain and our business partners to comply with our values and to demonstrate the highest standard of business conduct. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our business.

We undertake an annual audit of our Preferred Supplier List (PSL) recruitment agencies in accordance with our audit compliance procedure, which includes the audit of modern day slavery prevention checks and right to work documentation. From the audits carried out in 2023 no major concerns were identified.

The risk of modern slavery is a specific item captured on our organisational risk register and monitored on an ongoing basis under our Risk Management Framework, ensuring Executive Leadership visibility and responsiveness to any existing or emerging risks.

Training

EMCOR UK regularly notifies its employees of their obligation to comply with our Code of Business Conduct and Ethics and employees are reminded of the importance of ethics and legal compliance. All employees undertake annual training programmes on ethics and business conduct in addition to specific annual training on slavery and human trafficking. We believe that these help create an ethical and legally compliant culture and equip our employees with the knowledge and skills to identify any potential breach of our policies.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes EMCOR UK's slavery and human trafficking statement for the financial year ended 31 December 2023.

This statement was approved by the Executive Leadership Team on 25 April 2024.



Cheryl McCall (May 7, 2024 10:19 GMT+1)

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