



TRICEL

GENERATIONS OF INNOVATION

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

NOVEMBER 2024

Welcome

At Tricel, we are committed to upholding the highest standards of integrity, ethics, and respect for human rights in all aspects of our operations.

Our Modern Slavery and Human Trafficking Policy underscores our zero-tolerance approach to any form of modern slavery, forced labour, or human trafficking within our organization and across our supply chains.

Modern slavery and human trafficking are serious global issues that impact millions of people worldwide, often hiding in plain sight. As an employer and responsible corporate citizen, we recognize our role in identifying, preventing, and addressing any potential risks of exploitation. This policy reflects our commitment to creating a workplace where every individual's rights and freedoms are respected, and where unethical labour practices have no place.

As part of our efforts, we are dedicated to creating a safe and inclusive environment where all employees can thrive. This involves robust recruitment practices and ensuring transparency within our supply chains. We also provide training and resources to our employees to raise awareness about modern slavery and human trafficking, empowering them to recognise and report any suspicious activities.

If you have any questions regarding this policy or its content, then please get in touch.



Colette O'Donoghue
Head of HR and Water UK



1. Introduction

Modern slavery is a serious and organised crime that destroys communities and causes significant harm to victims. It is the illegal exploitation of people for personal or commercial gain, and involves people being coerced and forced into providing a service to others. It is a crime that affects people of all genders, ages (including children) and ethnicities and is a violation of fundamental human rights.

2. Zero Tolerance

Tricel adopts a zero tolerance to modern slavery and human trafficking, and all forms of corruption and bribery, directly and indirectly, associated with these criminal acts. While no such abuse is tolerated, an open and transparent approach is required by Tricel and our suppliers, to ensure we take steps to identify and tackle any instances of modern slavery in our supply chain.

As a Company, we fully support the government's objectives to eradicate modern slavery and human trafficking.

We believe that everyone has a right to be treated with dignity and respect at all times and under all circumstances.

3. Definitions

For the purpose of this policy, the following definitions shall apply:

- Modern slavery is the term used within the UK and Ireland and is defined within the Modern Slavery Act 2015 and the Criminal Law (Human Trafficking) Act 2013 respectively. The term is used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.
- Human trafficking is where a person arranges, or facilitates, the travel of another person with a view to that person being exploited.

4. Policy Purpose

This policy provides a framework to ensure:

- All Tricel employees understand and are aware of their responsibilities in relation to modern slavery.

- The development of an approach to identifying and tackling any modern slavery within Tricel's supply chain.
- The implementation of transparent, and proportionate governance and assurance processes.
- Reporting of instances (or concerns) of modern slavery.

5. Responsibilities and Accountabilities

The Company recognises that it is responsible for promoting ethical business practices and policies that protect workers from being abused or exploited.

The prevention, detection and reporting of modern slavery in any part of Tricel or its supply chain is the responsibility of all those working for us or on our behalf.

Therefore, this policy applies to all people working for Tricel, or on behalf of Tricel, in any capacity, including employees at all levels, directors, agency workers and contractors.

6. Suppliers and Contractors Responsibilities

Tricel requires all organisations with whom it is engaged to ensure that their goods, services, materials and labour-related supply chains:

- Fully comply with Modern Slavery Act 2015 and the Criminal Law (Human Trafficking) Act 2013 respectively.
- They are clear, transparent and accountable.
- Are free from ethical ambiguities.

Tricel expects that its contractors operate to the highest level of ethical standards and will hold their own suppliers to the same high standards.

Tricel may require employment and recruitment agencies, and other third parties supplying workers to teams, to demonstrate their compliance with this policy.

7. Awareness and Training

Human trafficking is a concern, and we acknowledge that there is a risk that criminal elements may seek to exploit Company services to undertake human trafficking activities. Tricel undertake training in relation human trafficking and labour exploitation. The purpose of this training is to provide:

- Improved understanding of human trafficking indicators and risk factors.
- Guidance on treating victims of trafficking compassionately, confidentially and competently.
- Actions to take when reporting suspected instances of trafficking.
- Improved awareness of types of forced labour and distinction between forced labour and other forms of modern slavery, such as child labour, self-dorm and debt bondage.

Tricel will raise awareness of this policy by notifying suppliers and contractors with which we regularly engage.

Tricel will look for opportunities to raise awareness of modern slavery and human rights abuses. Appropriate training and guidance will be provided.

Tricel will maintain records of all employees who have completed modern slavery training.

8. Assurance and Transparency

Tricel has committed to implementing controls aimed to ensuring that modern slavery is not taking place anywhere within the organisations or in any of our supply chains.

Tricel takes a risk-based approach to its procurement and supply chain management processes in relation to modern slavery and keeps them under continuous review.

As part of ongoing risk assessment and due diligence processes, Tricel will consider whether circumstances warrant the auditing of suppliers or contractors to demonstrate their compliance with this policy.

9. Non-Compliance

If any employee of Tricel is discovered to have breached this policy, then appropriate action under our disciplinary policy.

If any supplier or contractor is found to have breached this policy, then appropriate action will be taken; this may range from considering the possibility of breaches being remediate, to terminating agreements.

10. Protected Disclosure Mechanism

Employee must notify your manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains of any suppliers at the earliest possible stage.

Employee who believes or suspect a breach of this policy have occurred or that it may occur you must notify your manager or report it in accordance with Tricel's Protected Disclosure Policy as soon as possible.

Under the Protected Disclosures Act 2014 (Ire) and the Public Interest Disclosure Act 1998 (UK) employees, contractors and suppliers are protected from victimisation, harassment and or disciplinary action as a result of any disclosure made in good faith.

11. Policy Review

This policy will be reviewed on an annual basis, to establish whether Tricel's approach continues to follow best practice by:

- Assessing and interpreting any recent case law and best practice
- Benchmarking Tricel's activities against statements and action plans undertaken by similar public and private processes.
- Re-evaluating the risk of non-compliance as part of our risk management and assurance processes.

12. Monitoring of this policy

Tricel may amend or change this policy from time to time to reflect legislation and to ensure best practice.

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