

Modern Slavery Statement

Financial Year: 2017/2018

Introduction	1
Our Business.....	1
Supply Chain	1
Due Diligence.....	2
Compliance	2

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Encirc Limited (Encirc) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Encirc has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

Encirc are the only company to offer a full service throughout the supply chain, saving time, money and effort. Based at two sites; Derrylin, Fermanagh, Northern Ireland and Elton, Cheshire, our three services provide our customers' with a single solution. We offer container glass manufacturing, filling and logistics, a unique service offering in our field.

Encirc is committed to delivering high standards of corporate governance and we aim to employ the highest ethical and professional standards and always to comply with all relevant laws and regulations applicable to our business.

Encirc is committed to preventing slavery and human trafficking in its corporate activities and its supply chains. This commitment is supported by our employee training programmes and company policies. We also expect the same high standards from those parties with whom we engage, such as our suppliers and customers.

Encirc is currently in the process of implementing a comprehensive values-based behavioural framework, which sets out the standards required of employees, including the importance of ethics and integrity. A revised Code of Conduct directly linked to the framework is due to be launched in Autumn 2018.

Employees are encouraged to report any perceived unethical behaviour to either their manager or a member of the HR team.

Supply Chain

Encirc are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. We require our supply chain members to confirm, in writing, that they each comply with the Modern Slavery Act 2015 and that slavery and human trafficking does not take place in any part of their business.

Encirc strengthened our capability in this area with the appointment of a Head of Procurement in 2017.

Due Diligence Process

As part of our process to identify and mitigate risk;

- Where possible, we build long term relationships with all of our suppliers;
- We explain our commitments to our suppliers and require them to confirm in writing their compliance with the Modern Slavery Act 2015;
- We have a Supplier Relationship Policy to ensure compliance with applicable legislation including the Bribery Act 2010
- We have a comprehensive and robust recruitment and selection procedure, fully compliant with all relevant legislation
- We complete regular audits in our premises on Health, Safety and Environmental matters

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and in our business, we provide training to the relevant members of staff.

Compliance

The Directors are responsible for monitoring compliance with our Modern Slavery Statement. This statement is reviewed and updated annually.

On behalf of Encirc			
Signed		Job Title	MD Encirc Ltd
Print	Adrian Curry	Date	19/7/18