

Modern slavery statement

Organisation

This statement applies to Ambipar Response Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2020/2021

Organisational structure

The Organisation has offices throughout the UK, Northern Ireland and the Republic of Ireland. Its Head office resides close to Gatwick in the South East of England with operational bases in Dundee, Barnsley, Bristol, Milford Haven, Harlow and Belfast.

The Organisation is part of the Ambipar Group who have offices throughout South America, the USA and Canada.

Ambipar Response Ltd is structured with an Executive Committee comprising of the CEO and Directors of the Company and a Leadership Team comprising of 8 Performance Unit leads. Number of UK employees totals 62.

The Organisation is an Environmental Incident Response Company and Operates across South America, Africa, Europe and the UK. We have more than seventy years of experience responding to major hazard events such as oil spills and chemical incidents.

Our teams provide services across the preparedness and response spectrum at a strategic, tactical, and operational level. Our preparedness services include training, audits, capability reviews, and exercise design / implementation, all of which focus on disciplines including crisis management, business continuity, and incident response.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

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Registration Number: 5723743 (V1 OTH06)

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and Ireland, and in many cases exceeds those minimums in relation to its employees.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to the supply of technical equipment and machinery, general office supplies and personal protective equipment (PPE). Most of our supplies are sourced directly from UK or EU suppliers. We do use 6 companies which are located outside of the EU. We make all suppliers aware of our adherence to the Modern Slavery Act and our expectations of them and their supply chains to comply also.

Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in its PPE supply chains because they have the potential to involve the provision of labour in a country where the protection against human rights may be limited.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Impact of COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

We did encounter an increased need for PPE during the Pandemic but our UK based suppliers were able to meet these needs.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

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In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery. We may terminate our relationship with suppliers, contractors, sub-contractors, other business partners, or any other individuals or organisations, working under our control, or on our behalf, if they breach this policy.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

Thorough due diligence checks are undertaken via questionnaire prior to the use of any new suppliers and regular annual checks are made to ensure continued compliancy. Comply with all UK laws when recruiting/employing personnel such as "right to work" checks and paying at least the National Minimum Wage.

If an employee believes or suspects a breach of this statement has occurred or that it may occur they must report this in accordance with our Whistleblowing Policy as soon as possible.

Policies

The Organisation has the following policies which further define its stance on modern slavery

- Slavery and Forced Child Labour Policy
- Organisational Code of Conduct
- Whistleblowing
- Complaints

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Continued Improvement

We commit to consistent review and improvement where possible to ensure we remain vigilant and compliant with the Modern Slavery Act. Over the next 12 months we aim to

- Update our company contract requirements to include specific requirements in relation to modern slavery and add termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- Raise awareness of Modern Slavery to all our employees by providing them with information/training.
- Begin to risk assess our suppliers to identify those of higher risk. High risk suppliers will be identified by considering:
 - (i) our total spend with the supplier per annum
 - (ii) the geographical location in which the supplier operates; and
 - (iii) whether the types of goods/service the supplier provides are known to be within a high-risk industry. High risk industries include the construction, electronics and textiles industries, and low-skilled labour.

Everyone is invited to comment on this statement and suggest ways in which we can improve. Comments, suggestions or questions can be addressed to HR.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

This document was approved by the Leadership Team on 29th April 2021

Signed: 
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Job Title: Administration Function Unit Lead