HUMAN RIGHTS & MODERN SLAVERY POLICY

ECHO HOUSE

“The world will not be destroyed by those who do evil, but by those who watch them without doing anything.”

— Albert Einstein

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INTRODUCTION AND OBJECTIVE

Echo House is committed to preventing modern slavery and human trafficking in all its forms. We recognise that modern slavery and human trafficking are serious crimes and violations of fundamental human rights. As a responsible business, we strive to ensure that our operations and supply chains are free from these illegal and unethical practices and have a zero tolerance policy.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, contractors, external consultants, third-party representatives, business partners and suppliers.

The objective of this Policy is to ensure that we have zero tolerance for any unethical practices, that all employees and those of our suppliers are completely free from any modern slavery and human trafficking and are properly employed and treated fairly and with dignity in all regards.

POLICY STATEMENT

Echo House prohibits all forms of modern slavery and human trafficking within our operations and supply chains. We are dedicated to upholding the principles of transparency, accountability, and ethical conduct in all aspects of our business. Our full statement which is available to the public can be found on our website.

This policy expands on our statement and describes in more detail our aims and objectives in eliminating modern slavery in our business and supply chains and how we aim to achieve this.

COMPLIANCE WITH LAWS AND REGULATIONS

Our current operations are limited to the UK and the Company acknowledges its responsibility to the Modern Slavery Act 2015.

RELATED POLICIES

This policy must be read and applied in line with the Organisation's Equality and Diversity, Data Protection in relation to GDPR, Recruitment and Selection Policy and Procedure, Child Labour Policy and Procurement Policy.

RESPONSIBILITY FOR THE POLICY

The Human Resources and Procurement Departments have responsibility for ensuring this policy complies with our legal and ethical obligations, with regard to staff and supplier processes respectively and that all those under our control comply with it.

The Finance Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

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EMPLOYEE RIGHTS AND WORKING CONDITIONS

Employees have a fundamental Human right to be treated equally fairly and with dignity in the workplace.

As such, we are committed to ensuring that:

- Employees have fair wages and employment agreements, and that any statutory minimum wages requirements are followed.
- Work hours do not exceed the maximum limit set by relevant legislation and that proper rest periods are provided between all working shifts as set out by government guidelines.
- All workers are free to exercise their right to form and/or join trade unions and to bargain collectively.
- Workers experience fair and equal treatment and access to opportunities and enjoy a work environment that is free of discrimination, harassment or intimidation.
- All workers' health and safety is protected in the workplace as per Echo's Health and Safety policy.
- Workers have access to fair procedures and remedies.
- No child under 16 is employed and where older children over 16 are employed, statutory rues are followed and that no child is required to perform any tasks that may jeopardise their health and safety of affect their development or schooling Modern slavery is a crime and a violation of fundamental human rights.

PROCUREMENT AND SUPPLIER ENGAGEMENT

Echo House expects all suppliers, contractors, and business partners to share our commitment to combating modern slavery and human trafficking. As such we require them to confirm they have read, understand, and comply with this policy.

We expect the same high standards from all our contractors, suppliers, and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards.

DUE DILIGENCE

Echo carries out due diligence processes in relation to ensuring slavery and or human trafficking does not take place in the organisation or supply chains.

RIGHT TO WORK

- In line with our Recruitment and Selection Policy and Procedure and Child Labour Policy all employees will be required to prove their Right to Work in the UK including any appropriate documentation or an online right to work check share code to prove their eligibility to work in the UK.
- All agency workers recruited through our approved agencies will also be required to prove their Right to Work to the agency and Echo will conduct annual audits to ensure that legal requirements are adhered to.

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NATIONAL LIVING WAGE

Echo have committed to paying all employees accept any person on work experience through school, a training or apprenticeship contract a minimum of the National Living Wage regardless of their age.

This approach allows us to use the National Living Wage as a benchmark for all salaries accept those outlined above and ensures everyone is receiving fair and equal pay throughout the business regardless of their age. As we only operate in the UK we only adhere to the UK Governments National Living Wage in regard to pay.

How is the National Living Wage monitored

- The Human Resources team create a report each quater as part of their overall HR report that clearly identifies that pay is regularly audited. The report will specifically look at working hours, date of birth and salary.

WORKING TIME REGULATIONS AND REST BREAKS

Echo is committed to following the government guidelines on working time regulations and rest breaks.

MAXIMUM WEEKLY WORKING HOURS

No employee at Echo works on average above a 48 hour week, unless they have signed Echo's 48 hour opt out agreement.

REST BREAKS AT WORK

Echo follows the government guidelines on rest breaks for all employees.

- 20-minute rest break during their working day, if they work more than 6 hours a day.
- **Daily rest:** 11 hours rest between working days
- **Weekly rest:** an uninterrupted 24 hours without any work each week, or an uninterrupted 48 hours without any work each fortnight.

HOW IS THIS MONITORED

This is monitored on a monthly basis by our Health and Safety Supervisor and Human Resources Teams through our biometrics system.

PROCUREMENT

Echo requires its suppliers to exhibit exemplary social responsibility in their conduct.

This includes:

- Prohibition of Child Labour
- Prohibition of forced labour and human trafficking
- Prohibition of illegal, clandestine and undeclared employment
- Assurance of fair wages
- Adherence to regulated working hours

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- Freedom of association

Confirmation of the above is obtained directly from Suppliers who are required to sign our Echo Life© supplier code of conduct and complete the supplier questionnaire. This is then reviewed for all approved suppliers as part of our supply chain management and audit process.

TRAINING AND AWARENESS

We provide training and awareness programmes to any member of staff in the HR or Supply Chain teams. In addition to this any person who is actively involved in recruitment activities also receives training. This is so they are educated about the signs of modern slavery and human trafficking, their responsibilities under this policy, and the action they should take if they suspect any wrongdoing.

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. This is done through annual auditing conducted by the Procurement team.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

REPORTING AND WHISTLE BLOWING

We encourage all employees to report any concerns or suspicions of modern slavery or human trafficking promptly.

If any employee thinks they have come across an instance of modern slavery or if in fact you are a victim yourself, please follow the Whistle-blowing procedure which can be found in our Whistle-blowing policy and procedure or Employee Handbook.

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ECHO HOUSE

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