



E-Cycle Limited Modern Slavery Policy Statement

E-Cycle is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of funds and the management of its activities.

E-Cycle adopts zero tolerance to modern slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts.

E-Cycle fully support the government's objectives to eradicate modern slavery and human trafficking.

We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

This corporate policy on Modern Slavery acknowledges the following:
Freedom of employees to terminate employment, freedom of movement,
E-Cycle prohibits any threat of violence, harassment and intimidation, debt bondage, bonded labour, obligation to work as a disciplinary measure and compulsory overtime.

Statement Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for our financial year ending 31st July 2018

This is our first annual statement and it contains a summary of progress undertaken of our current work plan. We continue to engage with a number of private and public sector organisations in pursuit of our investment, procurement and disposal activities.

Our activities usually take place solely in the United Kingdom. Our investment model is to recycle ethically and support economic growth using delivery partners, such as registered providers and other key delivery partners in the public and private sector.

Risk Assessment

E-Cycle have:

- Completed a review of this policy and statement against our activities to establish whether the approach we have taken follows emerging best practice by:
 - Assessing and interpreting any recent or emerging case law and best practice; and
 - Benchmarking our activities against statements and action plans undertaken by similar public and private organisations.
- Re-evaluating the risk of non-compliance as part of our cyclical Compliance Risk Register assessment.
- Undertaken a second risk assessment using our professional risk, procurement and regulation teams to determine our risk exposure.
- Reconfirmed that our primary risk is an association with a delivery partner or company with an ambiguous or non-compliant supply chain.

Additional risk mitigation. We have:

- Introduced new processes and procedures in relation to procurement and due diligence, as outlined later in this statement.
- Confirmed the applicability and enforceability of clauses and conditions included in our legal agreements and contracts.

Scope of our Procurement Activities

Our procurement activities take place in the United Kingdom and our contractors and suppliers are exclusively UK and EU based.

We typically host between 1-3 competitive procurements four yearly.

We procure services, supplies and works from small and medium-sized enterprises (SME companies), predominantly based in the UK or the EU.

In common with many organisations, our employees occasionally stay in hotels when conducting business away from the office. Accommodation and travel arrangements are organised through the company and occasionally procure meeting and conference venues to support our general business activities and these are selected to ensure good value for money. We note that the hotel and hospitality trade recognise the risk of modern slavery within their sector and a Stop Slavery Hotel Industry Network is being developed by the industry.

Procurement and Tender Process Improvements

Existing tender documentation includes the mandatory exclusion of any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

We anticipate that the UK's departure from the EU may result in some changes to the way we promote procurement opportunities within the UK and the remaining Member States; however, the process improvements described above are likely to continue for the next few years.

Due diligence improvements: As part of E-Cycle's Know Your Customer (KYC) due diligence process, we have made contact with World-Check – a database which provides wide-ranging information on organisations, including details of financial crime, bribery, corruption, human rights crimes and environmental crime convictions. E-Cycle will use World Check information to help inform its decision-making process and when onboarding new customers. E-Cycle have also been included in the mailing list with SmartSearch <http://www.smartsearchuk.com/news> to stay up to date with the latest news.

Management Responsibility and General Awareness

Responsibility for the preparation and publication of this policy resides with our management team. We have:

- Reconfirmed management responsibility for this policy and statement and received unanimous endorsement from our senior management team and our board.
- Raised awareness of this published statement and the Modern Slavery Act by notifying organisations/partners in our supply chain
- Delivery partnerships and other companies with which we regularly engage are mandated to complete the E-Cycle modern slavery questionnaire as part of our due diligence and to identify area's requiring attention.

A handwritten signature in black ink, appearing to read "Tony Prothero".

Tony Prothero
Commercial Director