

## Anti-Modern Slavery Policy 2024

### Policy Statement

Modern slavery is an exploitative crime and a violation of human rights. It takes various forms, such as forced or compulsory labour, debt bondage, child slavery, human trafficking and servitude; all of which deprive individuals of their liberty for the personal or financial gain of another individual, group or corporation.

The United Kingdom Modern Slavery Act of 2015 requires businesses with a demonstrable presence in the UK to publish an annual statement specifying the efforts taken to prevent slavery and human trafficking anywhere in their own business or their supply chain. This statement sets out the stance of MBP Solutions Ltd and its group companies (collectively, MBP Solutions Group) against modern slavery, and its pledge to implement and enforce effective systems to ensure that modern slavery does not take place in the business or its supply chains.

This policy relates to our commitments during the current financial year (1 January 2024 to 31 December 2024) and applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### Responsibility for the Policy

The Senior Management Team has the overall responsibility for ensuring that this policy complies with our legal and ethical obligations and that all those under our control comply with it.

- The Human Resources (HR) team must ensure that our recruitment practices always comply with human and labour rights legislation. The team must also ensure that key employees are given adequate and regular training on modern slavery in supply chains.
- Management at all levels is responsible for ensuring that those reporting to them understand and comply with this policy.
- The Group Legal Counsel has the responsibility to update the policy each year, within 6 months of our organisation's financial year-end.
- The Group Supply Chain Manager is responsible for ensuring that our supply chain suppliers are obliged to comply with all applicable laws, including the Modern Slavery Act 2015 in their contracts with the Company.
- All persons working for us or on our behalf in any capacity must read, understand and comply with this policy. They must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Comments, suggestions and queries about this policy are encouraged and should be addressed to the Group Quality and Sustainability Manager or the Group HR, Training & Development Manager.

### What we do

MBP Solutions Group is a world leader in the collection, handling, processing, production, and application of biological by-products, waste and related services. We focus on the optimal use of residues through the development of innovative by-product and residue solutions, with an open book approach to incorporating full traceability.

### *Our services*

We offer a wide variety of specialist services, including by-product and waste collection and handling, as well as a world-leading by-product management outsourcing service (OMBP). We do monitoring, sampling, analysis, logistics, sales, marketing and registration with authorities. When required, we also make the necessary arrangements for storage, cleaning, filtering and the addition of additives and repackaging.

### *Our products*

We offer a wide range of products including [biofuels](#), bioliquids, [substrates for biogas production](#), [soil improvement products](#), high-quality animal feed and [pet food](#) products, in addition to specialist [technical products](#) for a wide range of applications.

### *Regions of operation*

Headquartered in Switzerland, MBP Solutions Group has offices in other eleven countries: UK, Denmark, Norway, Sweden, Finland, Netherlands, Italy, United States, Canada, Singapore and China. We employ over 125 professionals; sell products in more than 50 countries, and handle over 210,000 tonnes of biological residues every year for a diverse range of clients from industries using biological raw material.

### *Our supply chains*

We provide by-product and waste management services to industries that prefer to focus on their core products. These are our tier 1 suppliers (direct suppliers), who are mostly companies from the omega-3, fish meal, oleochemical, food, beverages, feed, pharmaceutical, and nutritional supplements markets. Based on our expertise and technical knowledge of raw materials in various sectors, we find sustainable applications for the by-products and waste collected and supply them to customers as raw material substitutes in the areas of biofuels, technical oils, animal feed, fertilisers and anaerobic digestion substrates.

These synergies facilitate the use of Earth's limited resources in a way that minimises its impacts on the environment while delivering greater value with less input. As a result, our suppliers and customers generate less waste, reduce business costs, earn economic benefits, reduce risks to public health and the environment, and ultimately, contribute to complementary policy areas such as the green economy, innovation for sustainability and the circular economy.

## **Our Policies**

MBP Solutions Group is committed to high standards of corporate governance. As a signatory to the United Nations Global Compact, our company upholds the universal principles of human rights, labour, environment and anti-corruption. Our Code of Ethics, Personnel Handbook and policies address key areas that are directly or indirectly connected to modern slavery, such as human rights, anti-bribery and anti-corruption, non-discrimination and equality, grievance, and disciplinary conduct.

In particular, our Human Rights Policy Statement incorporates the international labour rights, the fundamental human rights and the UN Global Compact principles. We guarantee decent work to all our employees, and prohibit discrimination, harassment, forced or compulsory labour, child labour, and any other form of labour that constitutes a violation of fundamental human and labour rights.

## **Due Diligence**

We require all our employees to read, understand and comply with our policies, which are updated regularly, communicated via e-mail and made available on our HR Hub.

Our recruitment protocols ensure that wherever we operate, we respect the human rights of all the persons working for us or on our behalf in any capacity and guarantee that we do not engage in any form of modern slavery through

our employment practices. We comply with national laws on working hours, resting time, periodic leaves, fair income, equality and decent treatment.

### Performance Indicator

We use the following Key Performance Indicator (KPI) to measure our progress on the specific actions that our company has committed to:

- % of eligible staff members working in supply chain management, procurement and human resources that received training on human rights, and specifically on modern slavery.

### Training

We have a training course on MBP Learning for Modern Slavery available for eligible staff (e.g. staff working in supply chain management, procurement and human resources) to ensure that they have a good understanding of modern slavery and to help them identify and manage potential risks.

Our modern slavery training covers:

- business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

### Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for MBP Solutions Group. The statement has been approved by the senior management team of MBP Solutions Ltd and is reviewed annually.



**Helen Sainsbury**  
Group CEO