

# ALFRED H KNIGHT

## MODERN SLAVERY TRANSPARENCY STATEMENT 2023

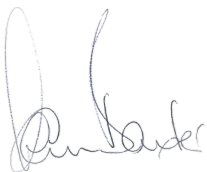
This statement relates to Alfred H Knight Holdings Limited covering all business regions, operating companies and business units throughout the world, including wholly owned and jointly owned subsidiaries. The statement relates to the financial year ending 2023.

The Alfred H Knight group is a privately owned leading provider of professional services in the testing inspection and certification sector covering the metals and minerals industry, agriculture, solid fuels and biomass and the circular economy. The Alfred H Knight group provides inspection, sampling, analysis and technical consultancy to a wide variety of clients from traders to miners, smelters to recyclers, governments and local authorities.

Alfred H Knight Holdings Limited and its Group believe that any form of modern slavery should play no role in the operation of our business. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all of our business relationships and we have set out the steps we take to ensure that slavery or human trafficking is not occurring in our business or in our supply chains in this statement.

This statement was approved by the Board of Alfred H Knight Holdings Limited on 30th June 2024 and is made in accordance with Section 54(1) of the Modern Slavery Act 2015.

Signed



**Ian Baxter**

**Chief Executive Officer**

**For and on behalf of Alfred H Knight Holdings Limited**

**Alfred H Knight Holdings Limited**

Kings Business Park, Kings Drive, Prescot, L34 1PJ, UK

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Alfred H Knight Holdings Limited 1945874 | Registered London, England  
All work is undertaken subject to our standard trading terms and conditions of business.



## **Relevant companies for the purposes of section 54(2) of the Modern Slavery Act 2015:**

Alfred H Knight Energy Services Limited

Alfred H Knight International Limited

Alfred H Knight Consultancy Limited

MEL Wastes Insights Limited

Alfred H Knight Eastern Europe Limited

Alfred H Knight Solid Fuels Limited

## **OUR POLICIES**

We have implemented robust policies and procedures to prevent modern slavery and human trafficking within our organisation and supply chains and we continue to keep those policies under review. Our policies are annually reviewed for compliance by our industry body, the Testing Inspection and Certification Council. These policies include, but are not limited to:

**Code of Conduct:** We have a comprehensive Code of Conduct which includes our Anti-Slavery and Human Trafficking policy, Anti-Bribery and Corruption Policy and our Code of Ethics and Compliance, that sets out our expectations for ethical behaviour, human rights, and labour practices for all our employees and suppliers.

**Supplier Due Diligence:** We conduct thorough due diligence on our suppliers to assess and mitigate the risk of modern slavery and human trafficking. This includes evaluating their policies, practices, and commitment to human rights and whether they hold policies that meet the standard of Alfred H Knight's Compliance and Corporate Governance requirements.

**Employee Awareness and Training:** We provide ongoing training and awareness programs to our employees to ensure they understand the risks of modern slavery and their responsibilities in preventing it. We encourage employees to report any concerns or suspicions.

**Whistleblowing Policy:** We have a confidential reporting mechanism, including a whistleblowing policy, to allow employees, clients, suppliers, or anyone working with us to report any suspected cases of modern slavery or human trafficking without fear of retaliation.

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**Continuous Improvement:** We are committed to continuously reviewing and improving our policies, procedures, and practices to ensure they effectively address the risks of modern slavery.

### TESTING, INSPECTION AND CERTIFICATION COUNCIL

We recognise the importance of our industry body the Testing, Inspection and Certification Council (TIC), and have actively engaged with them to improve compliance across our Group and we participate in annual audits of our processes and documentation. We are active members of their Legal and Ethics Committee and we continue to meet our commitments as laid down by the TIC. TIC has provided all members with their Compliance Code which is audited annually and defines the standard code of conduct and principles to which TIC members are required to comply which includes Modern Slavery requirements.

### KNOW YOUR CLIENT

We annually review our client onboarding, tendering and procurement practices in relation to modern slavery. To ensure our effectiveness we continuously monitor any third party we work with in the following ways:

- 24 hour monitored updates for sanctions and adverse media;
- A periodic review and request for third parties to submit an annual acceptance of AHK policies, in particular anti-bribery and corruption; and
- Periodic review of third party's payment requests and payments.

### COMBATING SLAVERY AND HUMAN TRAFFICKING

We continue to use our network of trusted suppliers and have improved vetting of new suppliers (including financial, sanctions and adverse media checks) we are pleased to say that to date, we have not identified any instance of modern slavery across our supply chain.

### CONTINUING COMMITMENT

We recognise the need to continuously improve our efforts to prevent any modern slavery in our operations and supply chains. In response, AHK has committed to growing our compliance and environmental, social and governance structures with additional hires, including a new direct head of Environmental, Social and Governance.

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