

Cyclife UK Ltd. Modern Slavery Policy Statement

Statement

1. Cyclife UK recognise that Modern Slavery is a growing global concern, and will ensure that our own operations, and those of our supply chains, are appropriately evaluating the risks of Modern Slavery. Cyclife operate in a highly regulated industry and our operations are governed by national and international standards; Cyclife recognise that our shareholders and stakeholders expect us to operate to the highest standards. Cyclife stands against modern slavery and will take all reasonable steps to ensure that our business prevents modern slavery within our sphere of control both directly and indirectly.

Organisation structure and supply chains

- 2. Cyclife UK is a 100% owned subsidiary of Electricité De France SA (EDF), and part of the Cyclife group. The Cyclife Group is the nuclear decommissioning and waste management business of EDF. Cyclife UK provides a ranges of services to the UK Civil and Defence Nuclear Sectors including, waste treatment, waste management and decommissioning, consultancy, and on-site waste management.
- 3. Cyclife UK head Office is located on a nuclear licenced site in Cumbria, which is home to the Cyclife MRF (Metal Recycling Facility).
- 4. Our supply chain procures materials, goods and services, including the supply of personnel, to support the operation of our business and delivery of projects.

Commitments - slavery and human trafficking

- 5. Cyclife will establish arrangements to ensure the risks associated with modern slavery and human trafficking are assessed and adequately prevented and mitigated:
 - Establishing Standards All Cyclife UK employees, are expected to work to our guiding values behaviours and expectation; in the context of Modern Slavery and Human Trafficking this includes Integrity and Nuclear Professionalism. These values will be communicated, where relevant, to our supply chain. Our Code of Conduct reminds our people that we are a company that acts honestly and ethically.
 - Establishing Management Arrangements Cyclife has established arrangements to manage our Modern Slavery responsibilities (CYC-551-1B). Cyclife has also established arrangements for recruitment to ensure only those applicants with a right to work in the UK are employed. We complete comprehensive security assessments; all employees receive a BPSS as part of their appointment process.
 - **Risk assessment and management** A high level risk assessment will be developed, implemented and subject to routine review.
 - Procurement and due diligence Our tender specification establishes requirements and expectations
 regarding how goods and services should be delivered. Tender evaluation processes are also designed to
 establish whether suppliers can meet these expectations. Our contracts will highlight the importance of
 preventing Modern Slavery and Human Trafficking. Cyclife will undertake due diligence when considering
 taking on new suppliers and in reviewing our existing suppliers, including elements that identify any
 potential risks relating to slavery and human trafficking.
 - Reporting Non-Compliance employees are encouraged to report any concerns of potentially illegal
 activities, unethical conduct or anything that might prejudice the business, using Cyclife UK's reporting
 of serious concerns procedure.
 - Employee Awareness Cyclife will ensure that all relevant personnel receive training and awareness of the issues around modern slavery and human trafficking within our organisation and to ensure a high level of understanding of the risks associated with modern slavery in our supply chains and in our business.
 - Monitoring and Measuring Effectiveness To gauge the effectiveness of the measures in place, the
 following Key Performance Indicators will be reviewed on an annual basis (Annual Review of Safety,
 Security and Environment):
 - Number of instances relating to allegations of suspected or actual breaches of Cyclife UK's policies and procedures relating to the Modern Slavery Act;
 - % staff trained (against requirements)

Additionally, audits are carried out to ascertain whether our suppliers comply with their obligations with regards to Social Responsibility including prevention of modern slavery.

Signed by:

Joe Robinson, Managing Director Cyclife UK Ltd, June 2022