



## **MODERN SLAVERY ACT**

### **Statement on behalf of Harsco Rail Limited:**

#### **Introduction**

This statement sets out the actions that Harsco Rail Limited takes to ensure that slavery and human trafficking is not taking place in any of its businesses or supply chains in compliance with section 54(1) of the UK Modern Slavery Act of 2015. This statement covers the financial year ending 31 December 2024.

#### **Organisation**

Harsco Rail Limited is registered in the United Kingdom being part of the Harsco Rail division and a subsidiary company of Enviri Corporation (formerly Harsco Corporation). The change of name to Enviri Corporation was announced on 5 June 2023 and trading with the new Ticker Symbol on the NYSE occurred on 20 June 2023. Enviri Corporation is a diversified global provider of industrial environmental services and engineered products and was incorporated in the state of Delaware, USA with the head office based in Philadelphia, Pennsylvania, USA.

Website addresses: Harsco Rail ([www.harscorail.com](http://www.harscorail.com)) and an updated Corporate website ([www.enviri.com](http://www.enviri.com)).

The ultimate parent company of Harsco Rail Limited is Ballagio SARL, a limited company based in Luxembourg, which acts as an intermediate holding and finance company to the business unit.

The core activity of Harsco Rail Limited is the provision of specialised services to railway track maintenance capital equipment. Further activities include the sale of parts and services in relation to railway track maintenance capital equipment.

#### **Codes of Conduct and Related Policies**

Enviri is an equal opportunity employer who believes every human being has the right to be treated with dignity and respect. Enviri's Human Rights Policy - as guided by the U.N. Guiding Principles for Business and Human Rights - prohibits unlawful discrimination, including freedom from harassment, bullying and abusive conduct. Enviri is committed to upholding human rights in all of its operations and facilities both within the United Kingdom and worldwide. Enviri does not condone or permit the use of physical punishment, modern slavery, servitude, human trafficking, or child, forced or involuntary labour in any of its operations or supply chains. Enviri will not knowingly conduct business with, and will terminate business dealings with, any supplier, contractor or other business associate who violates these standards.

## Codes of Conduct

There is an acknowledgement of Enviri's Human Rights Policy, including the prohibition of slavery and human trafficking within the Enviri Code of Conduct and the Business Partner Code of Conduct. Available in multiple languages, these are published in hard-copy formats and made accessible internally on the Enviri intranet and externally on the Enviri Corporate website.

Each new employee must review and sign a certification acknowledging receipt of and orientation to the Code of Conduct.

All employees are provided with reminders of Enviri's commitment to the standards in the Code of Conduct. This could include training, articles in Division newsletters, bulletin board announcements, portal posting (with site-level exposure for those without internet access) and other presentations.

Constant reviews of the status of Enviri's compliance with the Code of Conduct is administered. It is the duty and responsibility of each employee and business partner to understand and comply with the Codes of Conduct.

**Integrity Line** - A confidential, independently operated hotline monitored by a third party vendor (the "Integrity Line") is available without retaliation for employees and business partners to voice concerns and potential violations of the Codes of Conduct. The Integrity Line is accessible worldwide, 24 hours a day, 365 days a year via the web, telephone or text. Contact information is displayed at all sites and offices throughout the world to ensure that every employee and temporary worker has access.

**Conflict Minerals** - Enviri is committed to the responsible sourcing of conflict minerals and comply with laws that require disclosure of their use. Enviri's Conflict Minerals Policy provides guidance and instruction on the identification and prevention of the risks associated with Conflict Minerals which include, along with slavery and human trafficking, military conflict, human and labour rights violations and damaging impacts on the environment. Where deemed necessary specific training is conducted for relevant employees to ensure global compliance with this Policy.

**Health and Safety** – A Corporate Health and Safety Policy defines Enviri's commitment and application across all divisions, subsidiaries, third party businesses, contractors and visitors. Embedded in Enviri's Employee Care values is a vision to eliminate all workplace injuries and illnesses with a robust safety culture designed to protect employees, customers, work environment and community. Enviri is committed to a Zero Harm Policy which actively promotes the health and safety of all its workers and the public it serves. Enviri ensures that in each of its locations there is access to personal protection equipment, clean drinking water, restrooms, adequate lighting and ventilation, emergency exits and first aid equipment. Enviri also complies with fair wage and hour laws.

## Due Diligence of Supply Chains

A robust Due Diligence (and related procedures) policy has been implemented for Enviri's procurement teams to review and assess individual or company suppliers, contractors and third parties ("Suppliers") and business partners ("Partners").

Enviri's standard Terms of Purchase in the UK and in several other jurisdictions include a clause dedicated to Modern Slavery which clearly states that Enviri prohibits the other party from engaging in any Modern Slavery Practices within their businesses or their supply chains in connection with any trade or contract with Enviri.

Global Compliance and Ethics Guidelines provide direction to identify and screen potential at-risk Suppliers and Partners prior to engagement or contract, and as an initial step in the due diligence process; these guidelines include the completion of a Due Diligence Questionnaire. The Questionnaire specifically requests details of Suppliers and Partners compliance with laws, including the UK Modern Slavery Act and laws and regulations concerning money laundering, confidentiality, bribery, fraud and corruption among others and, if there has been non-compliance, requests an explanation and details of any investigation or legal action. Further, the questionnaire ask if the Suppliers and Partners are willing to certify that their operations are free of any instances of slavery or human trafficking and, if not, to explain such reasons.

Enviri's relationship with its Partners and Suppliers are often long term. Enviri requires its Partners and Suppliers to comply with all legislation in the jurisdiction where they operate and encourages them to meet the equivalent standards to Enviri's own ethical conduct, labour, welfare, health and safety, environment, civil liberties and human rights.

Enviri's published Business Partner Code of Conduct describes the standards of behaviour required by law as well as professional conduct determined to best meet Enviri's commitment to integrity and ethical business practices. A process is in place for providing Enviri's Business Partner Code of Conduct to Partners and Suppliers with the requirement to return a written acknowledgement, certifying understanding and compliance.

Enviri has an expectation for Partners and Suppliers to implement their own codes of conduct and standards within their own supply chains.

## Future Steps

Enviri recognises that the threat of modern slavery is not a static situation and intends to:

- Continue with awareness and training programmes for employees, contractors, Partners and Suppliers based within the UK and internationally;
- To further examine and understand potential future risks associated with modern slavery and conflict minerals, including how Enviri can ensure the prevention of these practices within its business and supply chain.
- Monitor and develop increased transparency within the supply chain process.

As Enviri's circumstances, business and locations change, and the nature of Modern Slavery evolves, this statement will be reviewed and updated at regular intervals or as necessary (at least on an annual basis) to ensure that it reflects current policies, processes and controls.

This statement has been reviewed by the board of directors of Harsco Rail Limited who authorise and delegate the approval and signature of this statement on its behalf to the Vice President EMEA & APAC, Harsco Rail as agreed by unanimous consent of the directors on 5 December 2025.

Signiert von:  
  
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Christian Mignat  
Vice President EMEA & APAC, Harsco Rail  
5 December 2025