

## Introduction

This statement is produced in line with the Modern Slavery Act 2015 (MSA 2015). The MSA 2015 requires large businesses, with sales of over £36 million, to be transparent about their efforts to eradicate slavery and human trafficking. This statement therefore explains the steps we are taking to ensure that slavery and human trafficking is not taking place in any of our supply chains or any part of our business. The statement applies to the financial year of 1st April 2022 to 31st March 2023.

The companies within our Group, to which this statement applies are: -

- WasteCare Limited
- WasteCare Compliance Plc

The Group is fully committed to preventing acts of modern slavery and human trafficking from occurring, whether in our business or our supply chains, and we require the same standards of our suppliers. This statement will be made available on our website to all who engage with us, whether in employment or in business, so that those parties may familiarise themselves with the contents.

## Our Organisational Structure and Workforce

Formerly named Silver Lining Industries, the company was established in 1980 recycling photographic, x-ray and printing waste for the recovery of Silver. Over the years, we have gradually expanded and evolved to recycle over 1,000 different waste streams from all commercial and industrial sectors – regardless of volume, location, or type.

We collect and recycle over 60,000 tonnes of hazardous and difficult waste, on behalf of over 20,000 organisations annually throughout the UK.

The Group employs over 450 people based across 9 regional service centres and 8 recycling facilities throughout the UK. The Group's workforce is a combination of full-time and part-time permanent employees, as well as agency workers.

The Group's recruitment process comprises of a combination of direct recruitment, and recruitment through agencies, all of whom are licenced and reputable.

The onboarding process ensures that all employees' status to live and work in the UK are checked prior to them commencing employment within the Group. Further, all our employees are subject to a robust on-boarding process, whereby, employees are informed and advised of the policies and procedures that underpin the way we operate.

## Our Policies

We allow all individuals who work or provide services to us the right to freely choose employment and the right to associate freely with other individuals.

Our employees all have individual and clear contracts of employment, which inform them how to terminate their employment with the Company, should they choose to do so. Equally, workers are free to choose whether to join a trade union or not.

We ensure our working practices are in accordance with the Equality Act 2010 and all employment legislation. We do not engage in forced or involuntary labour and have a zero tolerance approach to the same, meaning we do not tolerate any of our suppliers engaging in such conduct. We require suppliers to certify that they do not participate in any forced or involuntary labour with their workers, subcontractors, agents, or associates.

As part of the organisation's induction process, we train all staff on the relevant laws, regulations, and standards for combating Modern Slavery and to treat others with respect and courtesy. This ethos is represented in the supply of Group policies, which include, (but are not limited to) policies on Equal Opportunities, Dignity at Work Policy, Grievance, Whistleblowing Policies, Corporate Social Responsibility and Anti-Bribery and Corruption.

Further, and in order to ensure that as a Group we support our employees, our employees have access to our Employee Assistance Programme (EAP). The EAP is provided free of charge to employees providing access to a range of confidential services and support both online and over the phone.

## Raising Awareness of Modern Slavery in the Workplace

As part of our ongoing due diligence process, we have visual aids in multiple languages within our site to prompt victims to come forward and seek help. The posters also act as a good reminder to all staff of the signs of slavery, and what to do should they suspect that any employee or worker is potentially at risk.

Managers are re-trained twice a year on Modern Slavery, and we focus on ensuring management is not only aware of the signs of modern slavery but can also be confident to address any concerns that may be raised to them. This is an important step that the Group have taken, as our managers on site have frequent contact with employees and workers, and therefore it is important that they have this knowledge.

## Our Suppliers

Our principal suppliers are production suppliers, haulage firms that specialise in waste management and reputable recruitment agencies who are based in the UK, and therefore we do not consider them to be high risk.

However, we do establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. All suppliers of goods and services to the Group must comply with all relevant legislation and standards as relevant to their industry, including, human rights, bribery and anti-corruption and health and safety. We use our reasonable endeavours to conduct risk assessments of the third parties and investigate working conditions of workers within our supply chain.

As part of our risk assessments, we have procedures in place to identify whether there is a possible risk of slavery and human trafficking either in the business or our supply chain. The Company conducts regular audits of the supply chains and identifies if any suppliers are situated in countries where modern slavery is high. We aim to work with our colleagues and suppliers to ensure collaboration to remedy or mitigate such risks.

Any instances of non-compliance with the MSA, or allegation of potential modern slavery in either our group, or in relation to a Supplier would be thoroughly investigated and dealt with appropriately on a case-by-case basis. Any allegations of non-compliance would always be reported to the Group's Board of Directors.

## Key Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

## Focus for 2022/23

Recruitment across all our facilities is controlled and managed through our HR department. At any time, only a handful of staff are sourced on an eight-week temp to perm basis from preferred supplier recruitment agencies. The agencies are audited annually and are required to confirm that they satisfy the Modern Slavery Act. Our site managers and divisional heads undergo an annual review as well as regular team meetings which cover health, safety and staff welfare training; this includes awareness of the MSA.

Our Wastecare Training Academy is developing a new training module for our managers, entitled Working within the Law, which helps our colleagues to know clearly where the lines are and how to ensure as individuals we continue to be aligned to any upcoming legislative changes in relation to the Modern Slavery Act 2015.

We plan to hold regular review meetings with our suppliers to ensure they are also adhering to the MSA.