

## **Modern Slavery and Human Trafficking Policy | CPSPLGP008 v 1.5**

### **INTRODUCTION AND POLICY STATEMENT**

The Modern Slavery Act 2015 (the 'Act') mandates that Companies with turnover in excess £36m prepare a slavery and human trafficking statement each financial year, Electrical Waste Recycling Group Limited T/A Waste Experts (Waste Experts) is not required to prepare a statement, however recognises the potential for modern slavery to take place and voluntarily makes this policy available.

Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and much of the world and a violation of fundamental human rights.

Waste Experts have a zero-tolerance approach to modern slavery and human trafficking and are committed to acting ethically and with integrity in all activities and business relationships and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect modern slavery.

### **OUR BUSINESS**

The economic, social, and environmental footprint of our business activity is a fundamental consideration in Waste Expert's commitment to responsible and sustainable business growth.

Waste Experts is one of the UK's leading waste management companies in the UK and offer in house WEEE offering many solutions for all electrical waste and battery recycling together with secure treatment of end-of-life assets and commercially sensitive products. Offering a total waste management service covering every postcode within the UK together with a Producer Compliance Scheme ensuring producers of electronic equipment meet their regulatory obligations.

## **RESPONSIBILITY FOR THE POLICY**

The Directors and senior management team of Waste Experts have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us or on our behalf in any capacity comply with it.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity (including our employees, suppliers, workers, directors, agents, distributors and all third-party business partners).

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

## **COMMITMENT**

Waste Experts have implemented and enforced a number of measures, policies and controls both internally and externally to ensure compliance with the requirements of the Modern Slavery Act 2015 including:

Training on this policy and the risk our business faces from Modern Slavery and Human Trafficking forms part of the induction process for all individuals joining the business and an e-learning module has been created for all existing staff employed in a purchasing function. Regular refresher training will be provided as required.

The issues surrounding Modern Slavery and Human Trafficking have been added to the Waste Experts Handbook, which is available to all employees.

The Waste Experts, Terms, and Conditions of Purchase have been amended to encompass Modern Slavery and Human Trafficking and copies are available for our suppliers on request.

All suppliers are required to sign the Waste Experts Code of Conduct agreeing to commit to the elimination of slavery in every form and to implement measures to ensure that no such practices take place within their own organisation or their supply chain.

## **COMPLIANCE**

All people working for us or on our behalf in any capacity must:

- Read, understand, and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy; Waste Experts Handbook April 2017 Modern Slavery and Human Trafficking Policy 38
- Notify their immediate manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future; and
- Raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

## **BREACHES OF POLICY**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## **ONGOING REVIEW**

Waste Experts will review both its supply chains and external operations and its internal operations on an ongoing basis to check compliance with the above policy, and to check that our policy is being implemented effectively.

## VERSION CONTROL

Version	Date	Author	Approver	Change Description
1.0	26/2/2020	J Richardson	S Donaghey	New Policy
1.1	28/1/2021	J Richardson	S Donaghey	Reviewed and updated
1.2	28/1/2022	J Richardson	S Donaghey	Reviewed no changes
1.3	20/1/2023	J Richardson	S Donaghey	Reviewed and updated with WE reference
1.4	12/2/2024	J Richardson	S Donaghey	Reviewed and updated
1.5	31/01/2025	S Heagney	S Donaghey	Rebrand