

## **Modern Slavery & Human Trafficking Policy Statement**

### **Modern Slavery Act 2015**

#### **Introduction**

This Policy Statement is made in accordance with section 54 (1) of the Modern Slavery Act 2015 and constitutes as 1<sup>st</sup> Waste Management Ltd (1<sup>st</sup> Waste) Slavery and Human Trafficking Policy/Statement.

#### **Organization's Structure and Business**

1<sup>st</sup> Waste is a large Waste Broker in the South of England. Established in 1999 we supply an extensive range of services across the United Kingdom via third-party providers.

#### **Policy Statement – Our Ethos on Slavery and Human Trafficking**

1<sup>st</sup> Waste has a zero-tolerance approach to Modern Slavery and Human Trafficking. The Company is committed to acting ethically and with integrity in all our working practices, business dealings, and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to talking about Modern Slavery throughout our supply chains, consistent with our disclosure under the Modern Slavery Act 2015. We expect the same high standards from all our suppliers.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels. It does not form part of any employee's contract and we can amend it at any time.

#### **Our Supply Chains**

Our supply chains include obtaining waste services from a number of third parties. All Directors, Heads of Departments, and all other staff responsible for procuring these services are dedicated to ensuring that said suppliers always adhere to our ethos and support our compliance with the Modern Slavery Act 2015.

All staff involved in the procurement of our suppliers must establish that they are dealing with trusted supply chains and discuss any potential risks with regard to new supply chains. All supply chains have been provided with a copy of this policy and are required to confirm their compliance with it.

#### **Due Diligence**

We have in place a policy to protect whistle-blowers who highlight to us any risk of slavery or human trafficking within our business. As part of 1<sup>st</sup> Waste's due diligence process, we continually monitor systems to ensure that the company does not support or deal with any business or individual knowingly involved in Slavery and Human Trafficking.

#### **Recruitment**

The Company has stringent HR policies and recruitment practices in place to ensure compliance with The Modern Slavery Act 2015. Audit practices are in place to ensure all employees have the right to work in the UK and all other relevant employment legislation. Training for all employees who are involved in recruitment and the procurement of suppliers ensures that Slavery and Human Trafficking are not taking place within the Company and its supply chain.

## Communication and Awareness

The Modern Slavery Act 2015 is unlikely to be relevant to the majority of our staff as they are not involved in the procurement of services however this Policy is available to access on our website for all staff to view. Our zero-tolerance approach to modern slavery must be communicated to call suppliers at the outset of our business relationship with them and reinforced as appropriate thereafter.

*Our Modern Slavery Policy is also guided by the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.*

Signature:

A handwritten signature in black ink, appearing to read 'Richard Groome', written over a horizontal line.

Name: Richard Groome Position: Managing Director

Date: 16/10/2024