

Modern Slavery Statement 2020

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1.Introduction

March 2020

People are the heartbeat of what we do, and modern slavery presents a fundamental risk to our business, our activities and our workforce. We need to ensure we maximise our own efforts and collaborate with our customers to eradicate this abhorrent activity and raise awareness of the risks. In the simplest of terms, lives are ruined and futures are lost through the exploitation of people's labour. We will not put profits ahead of our people.

As our business evolves, we continue to work closely with our suppliers and partners to improve their ability to identify and manage the risks of modern slavery, sharing best practice and proactively auditing their own procedures to help further reduce our risk.

We have joined forces with Slave Free Alliance, Stronger Together and Hope for Justice to help ensure we remain diligent and focused on eliminating the risks of modern slavery. We are also signatories to the Welsh Government's Code of Practice for Ethical Employment. We have ensured a transparent and collaborative approach with these organisations, embracing their knowledge and training to ensure our team, suppliers and temporary workers are fully engaged, understand and willing to raise concerns about welfare issues.

We have rolled out new internal training, attended workshops and seminars from industry leading bodies, introduced a modern slavery toolkit for all customer facilities and strengthened our processes for introducing new suppliers to our business. In the year ahead we will continue to develop our approach to managing the risk of modern slavery within our business and supply chain and ensure our strategy is responsive to changing risks. We will continue to raise awareness of modern slavery to ensure we do our small bit to help the global fight.



2. Our business and supply chains

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We operate a 'hub and spoke' model of recruitment, having never seen a branch-based model as being the future of recruitment we established and have continued to run our business with limited office infrastructure.

Our Head Office in Caerphilly, South Wales supports operations throughout the UK, providing temporary workers into key sectors including Waste, Recycling, Distribution and similar manual operative roles. Recent new contracts have grown our supply chain of partner recruitment agencies, allowing us to provide innovative solutions to public and private sector customers across the UK.

Our regional teams operate on site or work from home, ensuring geographical coverage across large parts of the UK. We recognise that this diverse team and geographical spread can present challenges cascading key policies and procedures and therefore have adopted a proactive approach to internal training to ensure all of our team, particularly those that deal with temporary workers on a daily basis are fully aware of the risks of modern slavery.

We have introduced central resource to ensure we control, coordinate and manage our temporary workforce and provide further compliance checks to further reduce the risk of modern slavery. Our payroll procedures, compliance checking, onboarding process and ongoing interaction with the workforce ensures we have regular engagement, check the welfare and support our people.



3. Policies in relation to modern slavery

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Our commitment to eradicating modern slavery is weaved into many of our internal policies and procedures to ensure it remains relevant and a high priority in all our activities.

People policies

We cover all aspects of our employee journey (both temporary and permanent colleagues) including:

- Recruitment and Eligibility to Work
- Conduct
- Welfare and Wellbeing
- Whistleblowing
- Performance Management

Our people policies are further embedded into our ISO9001:2015 accreditation, ensuring we engrain quality standards into all that we do.

Supplier policies

We are a predominantly service driven business so have a limited supply chain. Strict controls are in place to reduce our risks, including:

- Annual Supplier Audits
- Requirement to demonstrate modern slavery policies
- Suppliers approved at board level
- Ethical Sourcing Standards (where relevant). Suppliers are risk assessed and an appropriate monitoring plan is agreed at board level and reported quarterly.

As part of our initiatives to improve our approach to modern slavery we have identified our supply chain as an area of concern and will complete additional, unannounced audits of our suppliers on top of our existing annual audits.

External verification

We utilise external HR support to verify all policies and procedures and to identify further initiatives we can introduce to learn best practice from larger organisations. We review our own statement and policies against the actions of larger corporations and industry leaders in all sectors, including entities with large supply chains, significant reliance on temporary labour as well as similar profile companies to our own. Our procedures are reviewed annually by Slave Free Alliance to ensure we remain at the forefront of the fight against modern slavery.



4. Tackling modern slavery – our business

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Modern slavery awareness forms part of our broader strategy on empowering our people, ensuring we maintain our ethics and standards, promoting equality and fairness in all that we do. We recognise that we supply sectors that are known to be high risk for infiltration by modern slavery gangs and therefore recognise that we need to continue to do more to maintain control, structure and discipline in all facets of our business to remain at the forefront.

We have learnt from Slave Free Alliance about significant cases in the UK that have affected the Recycling, Food, Warehousing and other sectors and this has increased our awareness of the risks posed to our reputation and the welfare of our workforce. Our priorities fall into a number of different areas:

Compliance

The team that faces our temporary workers are regularly trained on our policies and procedures in relation to modern slavery. Regular refresher training and spot checks are completed to ensure ongoing awareness. Quarterly appraisals, regular seminars, external training, online training and additional communication all help to ensure our staff remain aware, diligent and empowered to challenge any concerns.

Our Head Office team remain impartial from any Account Manager, reporting directly into the Financial Controller. Additional verification helps to reduce our risks further. We have invested in our CRM system to ensure we can prevent duplicate records, bank details and other information from being entered.

Regular due-diligence reports are circulated to ensure we continue to monitor this. This is reviewed weekly and in monthly board meetings by the leadership team.

Awareness

We continue to raise awareness at all customer facilities, working collaboratively with our customers to ensure we provide the safest possible environment for our workers to thrive. Initiatives include:

- Bespoke posters in multiple languages
- Confidential whistleblower hotline
- External audits from Slave Free Alliance and other organisations
- Toolbox Talks, seminars and training for all staff
- Digital learning content
- Unannounced and random auditing

Supply chain

We set high expectations of our own business and ensure we cascade this same standard to all of our suppliers. We extend our control measures and knowledge to our supply chain to help further reduce the risks of modern slavery and protect our customers and workers. Suppliers are verified, credit checked and audited to ensure compliance at regular intervals. Suppliers who are unable to demonstrate continued competency in this area are removed from our estate and black-marked against future usage.



5. Plans for 2020-21

We have identified several areas of our business where we will continue to manage our approach to modern slavery, outlined below:

- We will improve the communication we provide to customers prior to supplying them with temporary labour, ensuring they mirror our standards on modern slavery and provide suitable welfare facilities for the workforce.
- We will improve the literature and posters we display around customer sites, ensuring we provide independent advice and hotlines for workers to report concerns.
- We will regularly review our progress in all areas with customers and share transparently our findings, objectives and goals.
- We will create champions in areas such as modern slavery, gender equality and protecting vulnerable groups to ensure these remain at the forefront of our strategic vision.
- We will be transparent with customers where we utilise a broader supply chain and ensure they maintain similar standards of compliance and diligence.
- We will work with our suppliers who source goods from overseas, ensuring we map potential risks and aim to reduce our exposure to these, even if it means an increased cost to us.
- We will integrate increased communication on modern slavery into our induction and onboarding procedures and review this information on a quarterly basis.
- We will engage customers on modern slavery to ensure they are aware of their risks.
- We will encourage customers to participate in external seminars, including Slave Free Alliance workshops alongside ALS.



**This Modern Slavery Statement
has been approved by the Board
of Directors and signed by Steve
Lanigan, Chief Executive Officer**

