

<b>Document ID</b>	TWPO020V001	<b>Version Control</b>	1
<b>Last Reviewed:</b>	14/12/2023	<b>Date of next review:</b>	14/12/2024
<b>Creator:</b>	Graham Wildridge	<b>Reviewer:</b>	Graham Wildridge

## Introduction

Transwaste is committed to preventing slavery and human trafficking in all its business activities and ensuring compliance with the Modern Slavery Act 2015. We strive to act ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

## Organizational Structure and Supply Chains

Established in 2002 Transwaste operate at three sites within East Yorkshire and Hull, providing waste collection, recycling, treatment, and energy generation services. Our head office is based in Melton, East Yorkshire and we directly employ 134 people across the group.

We have relationships with external suppliers to source labour through managed service and agency arrangements, and materials and services for our business. Most of our suppliers are UK companies. Suppliers of goods and services to Transwaste must comply with all relevant legislation and international standards as relevant to their industry, including child and forced labour, health, and safety of workers, non-discrimination, employment law, human rights, fraud, anti-bribery, and corruption.

However, the provision of labour through managed service contracts and recruitment agencies remains an area of risk. We therefore maintain regular contact with our managed service providers through onsite account managers and hold regular meetings to discuss actions regarding preventing modern slavery in their business. As part of this we request that modern slavery questionnaires are completed by our partnering recruitment agencies.

## Policies and Commitments

Transwaste operates several policies to ensure that we conduct business in an ethical and transparent manner.

These include:

- **Whistleblowing Policy**

Encourages our employees to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. We investigate every whistleblowing case and seek to achieve resolution within the shortest possible timescales.

- **Employee Assistance Programme**

We provide our employees access to the YODHA platform. This provides an external, confidential, support service available by telephone and app through which advice and information is imparted to employees across a wide range of topics. This can include advice relating to support with modern slavery.

- **Recruitment Policy**

Transwaste operate a preferred supplier list and work only with recruitment agencies which share our commitment towards anti-slavery and the prevention of human trafficking. All entities ensure appropriate controls are in place to ensure employees have the right to work and are therefore protected by employment legislation.

## Risk Assessment and Due Diligence

We recognize the importance of identifying and mitigating the risk of slavery and human trafficking. We conduct regular risk assessments and due diligence on our suppliers and business partners to assess their compliance with our values and anti-slavery standards. This includes requiring all suppliers to complete a modern slavery self-assessment questionnaire.

<b>Document ID</b>	TWPO020V001	<b>Version Control</b>	1
<b>Last Reviewed:</b>	14/12/2023	<b>Date of next review:</b>	14/12/2024
<b>Creator:</b>	Graham Wildridge	<b>Reviewer:</b>	Graham Wildridge

## Employee Training and Awareness

All employees receive training on the signs of slavery and human trafficking and their role in preventing it within our business and supply chains. We actively promote awareness and vigilance through regular communications via posters and training via toolbox talks.

## Reporting Concerns

Transwaste encourages all employees, suppliers, and other business partners to report any concerns related to slavery and human trafficking.

If you suspect that someone is in slavery, DO NOT automatically confront them, as this may lead to increased harm for them. Firstly, assess the situation, and report to the **HSEQ Manager** if you are comfortable that it is safe to do. The HSEQ Manager will then inform relevant authorities or organisations.

If, for any reason, you are uncomfortable reporting your concerns to the HSEQ Manager, we would recommend using our whistleblowing procedure or contact one of the following:

- Call the Modern Slavery Helpline on 08000 121 700 or fill out an online form.
- Contact the Gangmasters and Labour Abuse Authority to report concerns about the mistreatment of workers on 0800 432 0804, or by email [intelligence@gla.gov.uk](mailto:intelligence@gla.gov.uk)
- Contact Crimestoppers on 0800 555 111
- Contact the Police
- Contact Anti-Slavery International
- or other specialist anti-slavery organisation

## Continuous Improvement

We are committed to continuous improvement in our efforts to combat slavery and human trafficking. This policy will be reviewed annually, and we will make necessary updates to address emerging risks and ensure compliance with the Modern Slavery Act.

## Communication

This policy is communicated to all employees, suppliers, and business partners. It is publicly available on our website, and we actively engage with stakeholders to raise awareness of our commitment to preventing slavery and human trafficking.

Mark Hornshaw  
Managing Director



14.12.2023