



Modern Slavery Statement

December 2023

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INTRODUCTION

Transwaste is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within its own business or in any of its supply chains. The Company will not tolerate slavery, servitude, forced labour, or human trafficking in any form.

This Modern Slavery Statement is designed to outline Transwaste's commitment to preventing and addressing modern slavery in accordance with the Modern Slavery Act 2015, Section 54, together with its progress over the past year. Transwaste recognises its responsibility to respect human rights and is committed to taking appropriate steps to ensure that modern slavery and human trafficking do not occur within its business or supply chains.

This is the first year of formal reporting by Transwaste and therefore future reports will assess progress against this baseline report. We have just started to use the IPHR Forum's Waste & Recycling Sector Guidance and Modern Slavery Toolkit together with guidance from the CIWM to help us review our approaches to date and plan actions for the future. The Transwaste Board of Directors has formally reviewed the company's commitments and achievements to ensure that the risk of modern slavery is mitigated through Transwaste's operations and its supply chains.

We acknowledge our responsibilities for the implementation and oversight of measures to minimise the risk of modern slavery and we have focused resources on this so that we can review our current position and take steps to improve; recognising that the nature of modern slavery means that we must be vigilant.

ORGANISATIONAL STRUCTURE & 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.

The IPHR Forum's Waste & Recycling Sector Guidance and Modern Slavery Toolkit identifies that the highest risk of modern slavery within the waste sector is where, 'there is sorting or picking required and where the use of temporary labour is relatively high'. Many of Transwaste's treatment processes includes sorting or picking, however, the majority of this is carried out by mechanical treatment rather than people. Where we do employ people on a picking line, we do use agency staff. We have changed our approach to using agency staff since 2021 however and if we use agency staff for more than 13 weeks and they are a suitable fit for the organisation, we then employ that member of staff on a full-time basis. This therefore reduces the risk of modern slavery occurring.

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.

RELEVANT POLICES & PROGRAMMES

The following Transwaste policies are relevant:

Anti-Slavery and Human Trafficking Policy

Reiterating our stance against all forms of modern slavery, this policy is provided to all employees upon induction via the employee handbook and is made available to everyone on our website (see [TWPO020V001-Anti-Slavery-and-Human-Trafficking-Policy.pdf \(transwasteltd.com\)](#)). It outlines our procedures and processes which are designed to guard against the occurrence of modern slavery or human trafficking in our business operations and supply chain.

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

Transwaste will conduct Annual risk assessments to identify and assess potential areas of exposure to modern slavery and human trafficking within its business and supply chains. This will be managed by the HSEQ Team who will work closely with our Site Managers and the Finance Team to ensure that we carry out appropriate risk assessment and due diligence within our own business as well as our supply chain.

We are therefore implementing steps to carry out due diligence on suppliers and other business partners. This will include, for example, asking them to complete a Modern Slavery Questionnaire to ensure that they comply with the Modern Slavery Act and that their practices align with the values and principles of Transwaste.

Transwaste shall continue to evaluate our supply chain to assess risks of modern slavery & human trafficking. Regular reporting from our primary labour supplier will be required to assess potential risk and the actions they have taken to respond to this.

Regular review of known risk factors within our directly employed workforce including reporting on and welfare checks will be carried out as appropriate.

Where any issues are raised the HSEQ Team will act to ensure that matters are responded to quickly and effectively. Anti-Slavery & Human Trafficking policy outlines clear procedures to ensure that everyone is aware of how to raise any concerns. Any concerns raised will be investigated immediately and action taken will be discussed and documented at our monthly health, safety & wellbeing meeting.

We will be updating our Anti-Slavery and Human Trafficking Policy to reflect this revised approach and employee training associated with it.

Employee Training and Awareness

The waste industry has been identified as at high risk of modern slavery. To combat this, employees at all levels will be provided with training on the risks of modern slavery and human trafficking in relation to Transwaste's business and supply chains.

Transwaste has currently put Toolbox Talk training in place for its employees (Including agency staff, provided in their native language) working at its Melton site. We will be developing our approach to training over the next year and our plans currently include:

·Including mandatory Modern Slavery Training within our inductions for all employees to ensure employees have awareness of the issue; where to go and what to do right from the start of working with us.

·Provide e-learning module to dedicated employees in each department on Modern Slavery Training

·Provide guidance to employees on how to identify and report concerns via posters in welfare areas.

·Continuing our roll-out of Toolbox talks on Modern Slavery to all staff working on our sites.

REPORTING MECHANISMS

Transwaste encourages the reporting of any concerns or suspicions regarding modern slavery within the organisation or its supply chains. Employees, contractors, and suppliers are encouraged to report any such concerns through appropriate channels, including a confidential reporting mechanism.

Examples of potential grievance channels in place include:

- ·Open-door access for all employees to speak to our directors at any time
- ·Whistleblowing Policy
- ·Confidential YODHA platform to allow raising of anonymous complaints
- ·Employee suggestion boxes
- ·Confidential raise a concern system via the QR card reporting system

KEY PERFORMANCE INDICATORS

Our approach to addressing modern slavery will continue to develop. Looking at the year ahead, Transwaste's KPIs will include:

- Anti-Slavery and Human Trafficking Policy to be updated
- Induction training to include mandatory Modern Slavery Training
- Staff Handbook to include Anti-Slavery and Human Trafficking Policy
- All employees at our three sites to have completed Modern Slavery Toolbox Talk
- Guidance to employees on how to report concerns to be posted on site noticeboards at all sites
- Directors and senior managers to receive Modern Slavery training
- Modern Slavery Questionnaire to be developed and sent to our supply chain
- Development of approach for conducting appropriate due diligence on supply chain to be carried out by team of HSEQ Team and Finance Team

DECLARATION

This Statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Transwaste's anti-slavery & human trafficking statement for the financial year ending 30th June 2023

Mark Hornshaw
Managing Director



13.12.2023