

Recycling Lives Ltd

Modern Slavery Statement

This statement is made pursuant to s.54 (1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended September 2019.

This statement sets out the steps that Recycling Lives has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Recycling Lives has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Structure, business and supply chains

Recycling Lives Ltd is a commercial business with c.447 staff operating in the recycling and waste management sector. Recycling Lives Head Office is based at the Recycling Lives Centre, 1a Essex Street, Preston, PR1 1QE and has sites based across the UK. These include both administrative centres and operational recycling sites. Recycling Lives can collect, process and recycle all waste streams including scrap metal, scrap cars, general waste, WEEE, plastics, paper and cardboard. We also offer waste management consultancy, compliance services, vehicle fleet disposal.

Recycling Lives supports a social welfare charity, Recycling Lives UK, the activities of which include offender rehabilitation, employment support and training, accommodation for homeless adults, and food redistribution.

We recognise that without a robust and thorough approach to tackling modern slavery, there is a risk that human trafficking may occur within various areas of our business including procurement, our supply chain and employment on our partners sites. Recycling Lives does not tolerate modern slavery and expects organisations we do business with to hold the same values.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Corporate Social Responsibility Policy.** This policy outlines how we will work in the best interests not only of our staff and stakeholders, but of the communities we work within, of society as a whole, and of the environment.
<https://www.recyclinglives.com/corporate-social-responsibility>
2. **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
<https://www.recyclinglives.com/careers/why-work-for-us>

3. **Whistleblowing policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. **Equal Opportunities Policy.** The purpose of this policy is to ensure equal opportunities for all workers, job applicants, clients and customers, irrespective of characteristics protected under legislation: ethnicity, colour, race, nationality or ethnic origin, marriage or civil partnership, gender or gender reassignment, pregnancy and maternity, age, religion or belief, disability, and sexual orientation. The policy also sets out the organisation's stance on valuing a diverse workforce and customer base.

All policies are available by emailing hr@recyclinglives.com

Due diligence procedures

Recycling Lives operates a supplier policy and maintains a preferred supplier list, mainly on a national basis. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery and on-site audits which includes a review of working conditions. Our Corporate Social Responsibility policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, at the outset of our business relationship and as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business and adequate training has been provided to their staff
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate), conduct right to work in the UK checks on all employees and that they have appropriate policies in place to tackle modern slavery
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations and that they regularly monitor and review the working conditions of their employees

We have a **zero tolerance** approach to any form of modern slavery and we may terminate our business relationships at any time should any instances of modern slavery come to light.

We conduct sample checks on employee data to identify potential indicators of modern slavery, whilst having a robust recruitment and selection process.

Identifying, assessing and managing risk

According to a report by the Gangmasters and Labour Abuse Authority, published in 2018, information suggests that individuals recruited for work in the UK and who may not have sufficient English language skills are often placed in recycling centres. This is also suspected to include vulnerable individuals. According to Hope for Justice, a charity that works with police and other agencies to support the victims of modern slavery, more than two-thirds of victims of modern slavery in the UK are made to work in a recycling or waste facility during their time in exploitation.

As our business has expanded rapidly since our last statement, we have established a governance group to perform a high-level risk assessment and enhance supplier processes. This group will be responsible for improving our supplier risk assessment.

Key performance indicators

We assess the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain by:

- Monitoring the risks in the sectors that we operate in and reviewing our operations and policies in light of any increased risks
- Monitoring the training provided to staff, the feedback received on the training sessions and measuring changes in the awareness of risks within our business
- Reviewing our grievance procedures and whistle-blowing procedures to ensure that adequate measures are in place to support, encourage and protect employees
- Regularly monitoring our business relationships with our suppliers and ensuring that they continue to have adequate measures in place to combat modern slavery

- Monitoring any reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified in our business and/or our supply chain
- Annual internal risk assessment and audit to review the effectiveness of our approach to tackling modern slavery and human trafficking.

Last year we introduced sample checks on employee data to identify potential indicators of modern slavery, in response to reports relating to modern slavery in the recycling industry. Key personnel have received training on modern slavery and provided positive feedback on what they have learnt.

Our grievance and whistleblowing policies have been reviewed to ensure they are comprehensive. Employee wellbeing initiatives have been effectively introduced, incorporating partnerships with external support agencies. This provides ongoing support, and encouragement to employees, helping us to further protect them. We continue to audit our suppliers, ensuring they have adequate measures in place to combat modern slavery.

Last year, we received no reports from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified in our business and/or our supply chain.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to management and supervisory staff so that they are aware and understand the signs of modern slavery so they know what to do if they suspect that it is taking place within our business or supply chain.



Approval for this statement

This statement was approved
by the Board of Directors on date shown:

Signed: *W. Astin* (Chief Executive) Date: 17/07/2019
Review date annually or as appropriate.