

## Albion Waste Modern Slavery Policy

Last updated: 13 February 2024

### 1. Introduction

Albion Waste is dedicated to upholding the highest ethical standards in our operations and supply chains. Although we fall below the threshold for mandatory compliance with the Modern Slavery Act 2015, our commitment to eradicating modern slavery and human trafficking is unwavering. We strive to continuously improve our practices and ensure that no part of our business, directly or indirectly, supports modern slavery.

### 2. Scope

This Modern Slavery Policy applies to all employees of Albion Waste, including permanent, temporary, and contract staff, as well as any contractors, consultants, suppliers, and other third parties acting on behalf of the company. We expect all individuals and organizations involved with Albion Waste to adhere to these principles and act in accordance with the Modern Slavery Act 2015.

### 3. Our Commitment

Albion Waste is firmly committed to conducting all business activities with integrity and transparency. We are resolute in ensuring that our operations are free from modern slavery, and we promote a workplace where every individual is treated with dignity and respect. Our dedication extends to ensuring that all workers are granted their basic human rights and are not subjected to exploitation or abuse.

### 4. Policies and Procedures

To address and prevent modern slavery, Albion Waste has implemented comprehensive policies and procedures that cover various aspects of our operations:

#### **Employment Practices**

We prioritize ethical employment practices by verifying the identity and eligibility of all staff members. This includes checking passports, driver's licenses, birth certificates, and proof of residency. We do not engage agency staff, which we consider a potential risk factor. Our commitment to fair employment practices ensures that all employees receive at least the living wage in the UK, and we carry out necessary immigration checks to comply with legal requirements. Our recruitment process aligns with Home Office Right to Work guidelines, ensuring that every potential employee undergoes a fair and transparent selection process.

#### **Supply Chain Management**

Albion Waste is committed to understanding and mitigating the risks of modern slavery within our supply chain. We conduct thorough reviews to identify areas of higher risk and take immediate steps to address these concerns. This includes finding alternative suppliers when necessary and ensuring that all contracts with suppliers include explicit obligations to adhere to the Modern Slavery Act 2015. We carefully vet new suppliers and regularly assess existing ones to ensure that they meet our anti-slavery standards. Any supplier found to be involved in modern slavery is not engaged, and we work to resolve any issues promptly.

### 5. Reporting and Accountability

We encourage a culture of openness and vigilance among our employees. Information about the risks associated with modern slavery is provided to all staff, who are empowered to report any concerns to our independent company accountant. Employees can raise issues confidentially, and all reports are taken seriously and investigated thoroughly. We also have a whistleblowing policy that supports employees in reporting concerns about modern slavery without fear of retaliation.

## 6. Training

Training on modern slavery is integral to our efforts to combat this issue. All employees, particularly those involved in procurement and supply chain management, are required to complete training that covers the identification of modern slavery, the steps to take if modern slavery is suspected, and how to ensure compliance from our suppliers. This training helps staff understand the risks associated with modern slavery, the importance of ethical procurement practices, and the procedures to follow if issues arise.

## 7. Monitoring and Review

Albion Waste is committed to ongoing monitoring and review of our policies and practices related to modern slavery. We regularly assess the effectiveness of our measures and make necessary adjustments to address emerging risks or changes in legislation. Our senior management team is responsible for overseeing compliance with this policy and for taking corrective actions when required. Regular reviews ensure that our approach remains effective and aligned with best practices.

## 8. Conclusion

Albion Waste is dedicated to maintaining a business environment free from modern slavery and human trafficking. Our commitment to ethical business practices and respect for human rights is reflected in our policies, procedures, and the actions we take to ensure that our operations and supply chains are free from exploitation and abuse. We will continue to work diligently to uphold these standards and to contribute positively to the fight against modern slavery.

**Signed by:**

*Marianna Banniha*

Director

Albion Waste

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