

Recycling Lives Ltd

Group 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 February 2022.

This statement sets out the steps that Recycling Lives has taken and continues to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain and is applicable to all businesses within the Group including Metal & Waste Recycling Ltd and Recycling Lives Ltd.

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 is a commercial business with c.450 employees operating in the recycling and waste management sector. Our Head Office is based at the Recycling Lives Centre, 1a Essex Street, Preston PR1 1QE and we have sites based across the UK. These include both administrative centres and operational recycling sites. The Recycling Lives business incorporates Metal & Waste Recycling Ltd. 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 and vehicle fleet disposal.

Our group of businesses supports our social welfare charity, Recycling Lives UK (RL 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.

Our policies

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

- Recruitment policy
- Whistleblowing policy
- Equal Opportunities Policy
- Code of Conduct
- Dignity at Work (incorporating anti bullying and harassment)
- Procurement Policy

All policies are available by contacting our HR department.

Due diligence processes

Recycling Lives operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier.

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

They have taken steps to eradicate modern slavery within their business and adequate training has been provided to their staff

1. They hold their own suppliers to account over modern slavery
2. (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
3. (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.

Risk Assessment and Management

The prevention, detection and reporting of Modern Slavery and Human Trafficking, in any part of our business or supply chains, is the responsibility of all Recycling Lives employees, individuals or businesses under our control.

Heads of function are required to be familiar with all aspects of the current regulatory regime and guidance, as well as keeping abreast of new legislation and regulatory regime changes, as well as ensuring that:

Regulatory and legislative changes are reviewed and any necessary amendments communicated to, and/or implemented within the relevant business areas.

Compliance policies and processes are reviewed annually, or (where applicable), on an ad-hoc basis where there are relevant regulatory/legislative changes.

An effective risk management framework is implemented across the business.

Any identified risk exposure is identified and mitigated

We also encourage openness and support to anyone who raises genuine concerns in good faith and to ensure no one suffers any detrimental treatment as a result of reporting suspicions of modern slavery or human trafficking in whatever form, may be taking place in any part of our own business, or in any of our supply chains.

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
- 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.

Our grievance and whistleblowing policies have been reviewed in the last 12 months to ensure they are comprehensive. Employee wellbeing initiatives are encouraged, incorporating partnerships with external support agencies. This provides ongoing support 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 modern slavery and human trafficking statement was approved by the Recycling Lives Board of Directors on 8/4/2021.



Gerry Marshall - Chief Executive Officer



Daniel Jackson - Director



Chris Chambers - Financial Director