



# MODERN SLAVERY POLICY & STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Red Industries Groups modern slavery and human trafficking statement for the financial year ending in March 2022.

RED is committed to ensuring modern slavery and human trafficking is not present in our business or supply chain. We work to develop and implement controls and system to mitigate the risk of forced labour and human trafficking anywhere within the business and supply chains. We operate a zero-tolerance policy in this regard.

## Organisational Structure and Supply Chains

Oliver Grace is the ultimate parent company of the group. The following Companies make up Red Industries Ltd:

Company	Company No	Site
Red Industries (Stoke) Ltd	05202754	Sneyd Hill Facility
Red Industries (Brownhills) Ltd	03244279	Brownhills Facility
Red Industries IS Ltd	02836533	Wednesbury Facility

RED is a waste management and environmental services provider. We operate several waste facilities in the Staffordshire and West Midland areas. These facilities include treatment and transfer stations, an industrial cleaning hub, and a non-hazardous landfill. We work with clients across a range of industries within the UK.

We work with a number of suppliers in the UK and abroad (our suppliers are primarily based in Europe), Our suppliers may be recruitment agencies, logistics companies, equipment and part suppliers, service providers, waste processors and other suppliers as required to meet the needs of the business.

RED does not enter into business with any organisation which knowingly supports or is found to be involved in slavery, human trafficking, servitude or compulsory labour. Should any failure to comply with the Modern Slavery Act 2015 be found, use of the supplier/contractor would be immediately terminated.

As part of our ongoing drive to meet our business standards and values, we continue to monitor and assess our suppliers through our Purchasing Procedures. Suppliers are also reviewed at periodic intervals, which may include supplier audits.

It remains our aim to deal with suppliers who have ethical and responsible sourcing practices in place and avoid sourcing from companies that do not meet our Purchasing Procedures. Preferably, suppliers should drive corporate social responsibility issues in a way that follow the guidelines set out in ISO 9001. Also, suppliers shall be aware of all sites and companies involved in their supply network, and upon request should be able to provide RED with adequate details of the supply chain supplied to RED



### **Organisation Policies and Procedure**

We operate an integrated Management System and are committed to operating at the highest standards – we hold ISO 14001, ISO 9001 and OHSAS 18001/ISO 45001.

We operate several policies procedures, which are available to all employees. These policies and procedures ensure we are conducting business in a transparent and ethical manner and with integrity. Our policies are enforced and are renewed as required.

- Whistleblowing Policy
- Equality, Diversity, and Inclusion Policy
- Anti Bribery & Anti Corruption Policy
- Grievance Policy

Our policies and procedures reflect our commitment to integrity and acting ethically in all of our activities. The systems we have in place, including our policies and procedures, minimise the risk of human trafficking or modern slavery occurring within our business and supply chain.

We encourage to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

### **Relevant Employee Information**

We have procedures in place to help us address the risk and ensure all prospective employees are legally entitled to work in the UK. We carry out several checks on potential and new employees, including confirming the person's identity, carrying out Right to Work checks, obtaining references and paying wages into a personal bank account.

The recruitment of our workforce is primarily conducted through recruitment agencies, however we do promote our vacancies through internal channels and recruitment portals. We recognise that this is an area where human trafficking and slavery is a higher risk – we work closely with selected and reputable agencies and require suitable checks to be carried out by the agency prior to the person starting work. We also look to transfer agency staff onto permanent contracts of employment wherever suitable and feasible.

Our business operates year-round without the need for specific 'seasonal workers' or irregular unskilled workers. We recognise that people are the cornerstone of RED's success. We value our diversity as a source of strength. We are proud of RED's history of treating employees with respect and dignity and are committed to building upon this tradition.

### **Relevant Activity**

Last Revised : 13.06.2022



RED undertook activities during the period which included:

- Reviewed recruitment process.
- Continued audits on current and new suppliers within the operational teams.
- All employees are trained on modern slavery at the beginning of their employment and this is reviewed annually.

During 2022/23, the business will have a specific action plan to drive the activities below:

- Review the Purchasing Procedure.
- Full risk assessment of all suppliers, to ensure all risks are considered including, financial, environment, legal, corporate social responsibility and market/supply.
- Completion of audits across all suppliers to incorporate the new audit procedure which result in a robust supply chain.
- Review Whistleblowing and Equality, Diversity, and Inclusion Policy.
- Educate and train employees within RED, to understand their responsibility around modern slavery.

(Once approved a project plan will be drawn up and implemented.)

### **Responsibility**

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Group **Technical Director** has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.



### **Monitoring**

RED Directors appreciate that the approach to combatting modern slavery will have to adapt over time in response to findings following the completion of various risk assessments.

The RED Directors intend to monitor the following over the next financial year to measure how effective the processes have been:

- The number of employees who have received training on modern slavery risks.
- The number of suppliers we have audited.

This statement has been approved by Board of Directors, which will review and updated on 1st June 2023.

Signed by Nigel Bowen, CEO, on behalf of:  
Chairman  
Chief Financial Officer  
Group Operations Director  
Group Technical Director  
Group Sales Director