

# Modern Slavery Policy

## Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Keenan (Recycling) Ltd (the 'Organisation') is committed to ensuring compliance throughout its business and supply chain with regards to the Modern Slavery Act 2015. The organisation takes a zero-tolerance approach to modern slavery and strives to act ethically and with integrity in all business dealings and relationships to ensure that modern slavery is not taking place anywhere in the business or in any of the supply chains.

The organisation is a leading organics waste management company in the Waste and Recycling sector, with over 100 employees nationwide and operating in Scotland and England. The organisation is an accredited Living Wage employer and is committed to paying everyone working for and on behalf of Keenan (Recycling) Ltd a higher minimum rate of pay than the current National Living Wage set by the government.

This Modern Slavery Policy reflects the commitment to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

This policy applies to all persons working for or on behalf of the Organisation in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

As part of the organisation's initiative it aims to:

- Identify, monitor, and assess potential risk areas in the organisations supply chains.
- Mitigate the risk of slavery and human trafficking occurring in the organisations supply chains.
- Protect whistle blowers.
- Be vigilant for signs of modern slavery in the supply chain and report accordingly.

## Responsibility for the Policy

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

To ensure all contractors and those in the company's supply chain comply with the organisations values and ethics supply chain compliance checks can take place.

The organisations compliance team consists of involvement from the following departments:

- Legal.
- Auditing and Compliance.
- Human resources.
- Procurement.
- Sales.

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

### **Compliance with the Policy**

Employees must ensure that they have read, understand, and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for the Organisation or under its remit. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage.

If any Employee suspects a breach of this policy has occurred or that it may occur, they must notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If an Employee is unsure about whether a particular act, 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, they must raise it with their manager as soon as possible.

The Organisation aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an Employee believes that they have suffered any such treatment, they should inform a Director of the company immediately. If the matter is not remedied, it can be raised formally using the company Grievance Procedure.

### **Communication and awareness of this policy**


Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals employed by the Organisation, and regular training will be provided, as necessary.

A zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Signature: 	Date of revision issue: 20/5/21
Name: Grant Keenan	Date of next review: 19/5/22
Position: Managing Director	