

Modern Slavery Act 2015: Slavery and Human Trafficking Statement

Financial Year 2017

Introduction

Tradebe is an international leader in waste reclamation and recycling solutions managing more than two million tons of waste annually, recycling 60% of that waste.

At Tradebe we are fully aware of our responsibilities under the Modern Slavery Act 2015 and are committed to our role in combatting this global problem. We apply robust practices to combat slavery and human trafficking both in the workplace and in our supply chains. This statement sets out the steps we have taken to understand potential modern slavery risks related to our business and to put in place controls that ensure there is no slavery or human trafficking present.

This statement relates to our UK business activities during the financial year to 31st December 2017.

Our Structure

Tradebe is a leading, global company in the environmental sector serving various markets including industrial, manufacturing, petrochemical, pharmaceutical, oil & gas, etc. We offer our services in Europe (UK, Spain and France and Germany), the Middle East and in the US. Tradebe, employing more than 2,100 people worldwide, operates more the 80 facilities across Spain (30), United Kingdom (20), United States (22), France (2), Oman (7) and now Germany.

The Group has annualised revenues in excess of 500 Million Euros, and currently operates in the following countries:

- Spain. The organisation operates and provides a range of waste management services, including wastewater treatment, solvent recycling, oil services, metal recovery, port services, mineral recycling & consultancy.
- UK. The organisation operates and provides a range of waste management services, including wastewater treatment, solvent recycling, incineration, clinical and radioactive waste management.
- USA. The organisation operates and provides a range of waste management services including chemical & waste water treatment and recycling, solvent recovery, government services, lab-pack and total waste management.
- Oman. The organisation operates and provides a range of waste management services including chemical & wastewater treatment and recycling, lab-pack and total waste management as well as field services.
- France. The organisation operates and provides a range of waste management services including chemical & wastewater treatment and recycling, lab-pack and total waste management as well as field services.

Our Business

Our business in the UK is organised into four divisions: Treatment Incineration and Recycling, Chemicals & Solvent Recycling, Healthcare (clinical waste) and Radioactives.

The responsibility for the organisation's anti-slavery initiatives is as follows:

- Policies: HR department is responsible for reviewing and issuing related policy.
- Risk assessments: line managers and/or Safety, Health, Environment, Quality (SHEQ) personnel with HR personnel support.
- Investigations/due diligence: HR Department and line managers are responsible.
- Awareness/Communication: delivered centrally with the support of line managers across the whole business.



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Risk and Exposure

We assess that there is relatively low level of risk with regards to modern slavery and human trafficking within our own direct UK business, however we are committed to ensuring that any such risk is identified and appropriate control measures are in place.

We acknowledge that a greater risk exists within our supply chains. Our supply chains include the sourcing of raw materials and services, principally related to the transportation, treatment and recycling of waste, and may involve services sourced both within the UK and overseas. Below we set out the control measures employed to identify and mitigate these risks.

Our Policies on Slavery and Human Trafficking

The organisation operates the following policies that describe our approach to identification of modern slavery risks and the steps we take to prevent slavery and human trafficking in our operations.

- **Whistleblowing Policy.** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities of the organisation or its related supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Equality Policy.** We are an equal opportunities employer committed to ensuring, within the framework of the law, that our workplace is free from all forms of discrimination. It is the responsibility of every employee to ensure their own conduct conforms to the expected standards and to flag issues should they discover behaviour that causes concern.
- **Employee Code of Conduct.** The organisation's code of conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating in the UK and abroad and in managing its supply chain.
- **Supplier/Procurement terms & conditions.** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics, and we expect suppliers to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Suppliers are expected to undertake whatever measures are appropriate to ensure that modern slavery & human trafficking is not present within their organisations or supply chains. Failure to comply with these standards will lead to contract review and may include removal from our approved supplier list.
- **Recruitment/Agency Workers Policy.** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency we commission before accepting workers from that agency. We ensure that agencies carry out all right to work checks and pass that information to us prior to employment. We require references prior to employment and carry out all appropriate document checks, including right to work, for all new starters whether sourced through an agency or otherwise. DBS checks are carried out when an employee is required to work in the restricted areas of some of our customers as required by law. All recruitment organisations are subject to the same supplier expectations outlined above.
- **Corporate Sustainability Report.** We produce a Corporate Sustainability Report, which is freely available to all employees and external stakeholders via our website, and sets out our commitment to combating modern slavery and human trafficking, the steps undertaken to ensure this, and our annual progress towards meeting our own goals.



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Due Diligence Processes to Combat Slavery and Human Trafficking

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. This process includes:

- evaluating the modern slavery and human trafficking risks of each new supplier, and targeting our assessment and controls where we judge that risk to be highest.
- ensuring that our expectations of business behaviour are clearly communicated to all suppliers. This includes, as a minimum, compliance with the requirements and sentiments of the Modern Slavery Act 2015, and in particular section 54(1)
- taking steps to improve substandard suppliers' practices, which may include providing advice to suppliers and requiring them to implement action plans.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier expectations, including the termination of the business relationship.

Employee Awareness 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 provide awareness training to our staff. We also expect our business partners to provide awareness training to their staff and suppliers.

Tradebe's awareness training covers the following:

- How to identify the signs of slavery and human trafficking, including recognition of goods or services offered at unrealistically low prices, which could indicate the use of labour engaged on unfairly low wages or wages below a country's national minimum wage.
- The initial steps that should be taken if slavery or human trafficking is suspected and how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- The role of our employees in ensuring our ethical and responsible recruitment policies are met.
- The role of our employees in ensuring that our requirements towards our suppliers are met.
- The importance of our employee Code of Conduct and other written policies.

Monitoring Effectiveness in Combatting Modern Slavery and Human Trafficking

The organisation continues to review the following key performance indicators (KPIs) to measure how effective we are in ensuring that modern slavery and human trafficking is not present in any part of our business or supply chains:

- Use of labour monitoring and payroll systems
- Level of communication and personal contact with our supply chain representatives and their understanding of, and compliance with our expectations
- Requiring all staff, supply chain managers & HR professionals have sufficient understanding of the issues surrounding modern slavery and the actions to take where appropriate.
- Ensuring supply chain verification is carried out by all staff who have responsibility for hiring contractors or supply chains. Our staff have to submit all requests through a dedicated purchasing team, to ensure the supplying company are compliant with all our company requirements. The same department then evaluates existing contractors and suppliers, on renewal, before they enter into new contracts.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31st December 2017.

CEO
TRADEBE UK
Date: 14th May 2018