



# BESPOKE RECYCLING SOLUTIONS

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## MODERN SLAVERY & HUMAN TRAFFICING POLICY

### Principle

The UK Modern Slavery Act 2015 requires businesses to publish a statement setting out the steps taken to demonstrate that slavery and human trafficking are not taking place in their supply chains or own business.

Modern slavery may constitute slavery, servitude, forced and compulsory labour and human trafficking, all of which exploit or revoke a person's freedom in order to exploit them for personal or commercial gain. This may occur at all levels, including employees, apprentices, directors, officers, agency workers, consultants, and contractors.

The purpose of this policy is to:

1. Set out our responsibilities (including the responsibilities of our Employees, suppliers, joint venture partners and agents) in observing and upholding its position on slavery and human trafficking;
2. Set out the measures to be taken to: -
  - Prevent slavery and human trafficking by having adequate anti-slavery procedures;
  - To monitor and identify any instances of slavery and human trafficking or attempted slavery and human trafficking;
  - To respond appropriately if slavery and human trafficking is uncovered; and
3. Provide information and guidance to those working for and with us on how to recognize and deal with slavery and human trafficking.

### Responsibilities

At Bespoke Recycling Solutions we believe in conducting our business honestly and to high ethical standards, as well as conducting our operations in full compliance with the law, thereby maintaining confidence in the integrity of our business. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. We enforce systems to ensure modern slavery is not taking place anywhere in our own business or in our supply chains. We offer transparency in this regard, consistent with disclosure obligations under the Modern Slavery Act 2015. We require the same criteria from all of our contractors, suppliers and associates, and as part of our contracting processes, we prohibit any use of compulsory or trafficked labour.

Our responsibilities involve:

- Ensuring the detection, prevention, and reporting of modern slavery in any part of our organization or supply chain
- Engaging with our suppliers to address the risk of modern slavery in our supply chain.



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## Measures

We are committed to implementing and enforcing effective systems and controls to satisfy ourselves that slavery and human trafficking is not taking place anywhere in our organisation and supply chains.

- Take a risk-based approach to our contracting processes and keep them under review: we assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Consistent with our risk based approach we may require:
  - Employment / recruitment agencies and other third parties supplying workers to our organization to confirm their compliance with our policies
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the same
  - As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our policy
  - If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure we take appropriate action. This may range from considering the possibility of breaches being remediated and
  - whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships and/or reporting the situation to the relevant authority

## Guidance

All Bespoke Recycling Solutions employees are recruited in accordance with clear HR procedures designed to comply with local legislation, including checks for eligibility to work in the host country, references, proof of a National Insurance Number (UK) and bank details. This demonstrates each person is acting in his or her own right. We also comply with national living wage requirements. All employees are required to complete the Company induction which covers a section in awareness of modern slavery and human trafficking. We also have a whistleblowing procedure for individuals to raise concerns.

The use of temporary agency workers may be necessary from time to time, to provide the flexibility to react and support operating requirements where demand requires. We require all agencies to have appropriate processes in place to demonstrate that all temporary agency workers are acting in their own right.

## Reporting

We encourage the early reporting of concerns or suspicions of behaviour that may be in breach of this policy. Concerns should be raised with a manager (if appropriate) or by following the procedure set out in the Whistleblowing Policy.

We reserve the right to report suspicion of modern slavery or trafficking to the relevant police authority for investigation and, if appropriate, prosecution.

## SILENCE IS CONSENT



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## Communication and Training

The policy will be communicated at regular intervals, using a range of appropriate media and providing opportunities for questions and concerns to be fully addressed. The policy will also be communicated to other stakeholders, including customers, suppliers and business partners, as opportunity or the need arise.

## Measuring Effectiveness

Although we understand that modern slavery risk is not static, and therefore will seek to mitigate the risks in the years ahead, to-date we have neither identified nor received disclosures of instances of slavery or human trafficking in our organisation or supply chain.

We will keep under review, monitor and assess how effective we are in demonstrating that slavery and human trafficking are not taking place in any part of our organisation or supply chain and we will take and implement all appropriate steps and measures to act on the findings and outcomes of any such reviews and assessments and maximise our effectiveness and continual improvement.

## Coverage and Responsibility

This policy applies to all Employees - individuals working at all levels and grades, including (but not limited to) senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors or any other person associated with Bespoke Recycling Solutions (collectively referred to as "Employees" in this policy).

This policy shall also be complied with by our advisers and agents and any suppliers used by us.

The Managing Director and all People managers are responsible for the implementation of this policy and other related policies and procedure, including the communication and detailed interpretation, monitoring and any reporting action in response to arisings of this policy. The management team is responsible for maintaining and reviewing this policy, and for clarifying and resolving general issues. The management team will oversee any audit of policy compliance on behalf of the Managing Director, which may be considered necessary.

The Managing Director shall update the management team on at least an annual basis on compliance with this policy.