**Clews Recycling Ltd**

MODERN SLAVERY POLICY Clews Recycling Ltd will comply with the Modern Slavery Regulations 2015 through the following steps:

1. Employees or contracted staff will be engaged on terms and conditions that embody all UK Employment legislation and issued with a contract of employment.
2. If sub-contracted staff are used, a director of that sub-contractor will be called upon to provide written confirmation that they comply with the Modern Slavery regulations 2015.
3. In the event that staff employed by a contractor or service provider, appear to be working under duress, the issue will be raised with the contractor or service provider and reported to the relevant authority.
4. Our staff will be trained on what constitutes Modern Slavery including trafficking, coercion, payment in kind, poor living conditions etc. An environment will be created within the workplace whereby staff and contractors can anonymously report any suspicions they may have about workers within our supply chain that could constitute Modern Slavery.
5. We may at any time request copies from all our suppliers of their policy to comply with the Modern Slavery Act and hold this information for reference for upstream customers in the supply chain
6. Where our suppliers, particularly SME’s do not already have a policy we will suggest they adopt a similar policy to this one and to sign and return it as confirmation that they comply with the Modern Slavery Regulations 2015.
7. Our staff will be trained to identify and report susceptible people who may be mentally ill, drug or alcohol dependent etc that appear to be working under duress from suspected itinerant waste collections who try to avoid scrutiny and documentation.

Richard Clews

4.11.20