



I Integrated Management System (IMS)

Standard Operating Procedure – 73 Modern Slavery and Human Trafficking

BEAUPARC GROUP POLICY ON MODERN SLAVERY

Approved by	Beauparc Board
Executive Director Sponsor	MD Beauparc
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1.0 INTRODUCTION AND PURPOSE

This standard operating procedure shall set out our arrangements as part of our corporate social responsibility.

Modern slavery is a criminal offence under the UK Modern Slavery Act 2015 (the "**Act**"). The Act imposes obligations on organisations of a certain size which carry on a business in the United Kingdom. Modern slavery can occur in various forms, including 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. As the parent organisation of a number of subsidiary companies with significant operations in the UK (**including Associated Waste Management Limited, WSR Recycling Limited, Scotwaste Recycling Limited and the New Earth companies.**) Beuparc has adopted this policy with the aim of preventing opportunities for modern slavery occurring within its business and supply chains. In this policy, the term 'modern slavery' has the meaning given to that term in the Act.

This policy applies to a) all employees, officers and directors of Beuparc and all of Beuparc's subsidiary companies and b) to sales agents, vendors, contractors, representatives, advisors and other third parties acting on behalf of any Beuparc subsidiary and (c) to contractors and suppliers of goods and/or works or services to any Beuparc Group company.

2.0 PROCEDURE

POLICY STATEMENT

Modern slavery and human trafficking are violations of fundamental human rights. They may take various forms, including slavery, bonded and forced labour, sex trafficking, child labour and domestic servitude. These criminal activities all deprive people of liberty in order to exploit them for personal or commercial gain.

Beuparc has a zero-tolerance approach to modern slavery and we will take all necessary measures to identify and combat risks to our business.

We are committed to ethical principles with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. Beuparc requires all employees, contractors and representatives to comply with the employment legislation and supply chain management legislation in the countries within which we operate.

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. This policy applies to all persons who act on our behalf in any capacity, including employees at all levels, directors, consultants, contractors, agency workers, volunteers, interns, business partners and our supply chain.

We are committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

Beuparc demands the same attitude of all who work for us and expect it of all with whom we have business dealings.

SUPPLY CHAIN MANAGEMENT

We will not support or deal with any business which is known to be involved in slavery or human trafficking.

As part of our due diligence procedure, prior to approving a new supplier, we will review the controls which they undertake to eliminate modern slavery and human trafficking, particularly in regard to goods and services imported from outside the UK and EU which are potentially more at risk of involving slavery and human trafficking.

PREVENTATIVE STEPS EMBEDDED IN BEAUPARC

In order to prevent the occurrence of incidents of modern slavery within our own business and throughout our supply chain we shall;

- Carry out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in our organisation or supply chains
- Identify, monitor and assess those areas of our business and supply chain most at risk from modern slavery and implement initiatives to enhance risk management effectiveness
- Incorporate anti-slavery and human trafficking obligations as part of our procurement agreements and contractual processes and, where appropriate, carry out an audit and/or investigation of the activities of those contractors, suppliers or business partners deemed high risk
- Train our staff to ensure that our policies in regard to the Act are embedded into the culture within which we operate
- Engage with our customers, suppliers and contractors to make them aware of our Modern Slavery Policy and communicate with them our expectations of adherences to our requirements.
- The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Beauparc has taken the following steps to ensure that modern slavery is not taking place:

- Trained the Managers on awareness of Modern Slavery and Human Trafficking and how to identify if employees have been trafficked
- Creating action plans to address risk to Modern Slavery and Human Trafficking (Modern Slavery and Human Trafficking Statement)
- Beauparc Whistleblowing Policy and Procedure
- Beauparc Bribery and Corruption Policy
- Beauparc Anti-Slavery Policy

- Beuparc Child Labour Policy

RESPONSIBILITY BOARD

Determination of corporate policy in respect of the UK Modern Slavery Act (i.e. this policy).

Approving the annual statement required by the Act .

Management

It is the responsibility of all line managers for ensuring that all those who report to them understand and comply with this policy.

Management are responsible for;

Allocating sufficient and appropriate resources to implement and ensure compliance with this policy including ongoing training and awareness

Operating and maintaining internal control systems to prevent the occurrence of modern slavery in our supply chains

Employees

Conducting business in a manner such that the opportunity for any incidence of modern slavery is prevented

Avoiding any activity that might lead to, or suggest, a breach of this policy.

Reporting any suspected incidents of modern slavery.

Beuparc shall:

Provide continued direction, commitment and support from the senior management team;

Continue to monitor and review the risks to business and update internal policies as and when required.

COMPLIANCE

All staff must read, understand and comply with this policy.

All staff must avoid any breaches of 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 us or under our control. Staff must avoid any activity that breaches this policy.

All staff must report to their manager at the earliest opportunity, if they suspect or believe there has been a breach of this policy, or that a breach may occur in the future.

Staff are reminded that there are systems in place to encourage the reporting of concerns and to protect whistle blowers.

Raising a Concern at Beuparc

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

If you are unsure whether a particular act constitutes slavery, or if you have any other queries, these should be raised with the Beauparc Legal and Compliance Department.

If you suspect a breach of procedure, act of slavery, you should raise your concern through the confidential helpline or our Whistleblowing Policy. A copy of our Whistleblowing Policy can be found in the Colleague Handbook.

We are committed to ensuring no one suffers any detrimental treatment as a result of the Modern Slavery Act 2015, or because of reporting in good faith their suspicion that an actual or potential slavery offence has taken place, or may take place in the future.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with your compliance with this policy.

If you believe that you have suffered any such treatment, you should inform the Beauparc Legal and Compliance Department immediately. If the matter is not remedied, and you are a colleague, you should raise it formally using our Grievance Procedure, which can be found in the Colleague Handbook.

COMMUNICATION

We will provide training about the risks of modern slavery and human trafficking to maintain a high level of understanding of this issue in our workforce.

Our zero tolerance approach to modern slavery will be clearly communicated to all suppliers, contractors and business partners when we commence a business relationship with them, and reinforced in our subsequent communications with them.

Our annual Slavery and Human Trafficking Statement will provide information to supplement this policy, setting out the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains, and in any part of our own business. Our annual statement will include details of our activities, supply chains and actions being taken to ensure that Modern Slavery is not deliberately or inadvertently supported by us.

BREACHES OF POLICY

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

Beauparc reserves the rights to terminate relationships with suppliers, individuals or business partners working on our behalf if this policy is breached.

Policy Review and Update

Colleagues are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Beauparc Legal and Compliance Department.

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

2.1 RECORDS

<i>Document/ Record</i>	<i>Location</i>	<i>Retention Period</i>	<i>Disposal Process (Reference)</i>
Supply Chain Questionnaire	Accounts	Duration of contract	Archive

THIS STATEMENT WAS APPROVED ON 31ST JANUARY 2020 BY THE BEAUPARC BOARD OF DIRECTORS WHO REVIEW AND UPDATE IT ANNUALLY.

BRIAN MCCABE
MANAGING DIRECTOR