

# ANTI-SLAVERY, HUMAN TRAFFICKING, AND HUMAN RIGHTS

Approved by: Guy Wakeley CEO  
Date reviewed: 17<sup>th</sup> March 2023

Reconomy  
Group



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# 1 INTRODUCTION

Reconomy Group is an innovative, tech-led provider of circular economy-focused services, with the purpose of creating a truly sustainable world by conserving finite resources. Supporting businesses around the world to improve their Environment, Social and Governance (ESG) outcomes, Reconomy Group delivers services through three main verticals – Recycle, Comply and Re-use.

At Reconomy Group we aim to do the right thing for our customers, communities, investors, regulators, and colleagues. We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and require our suppliers to do the same.

# 2 POLICY

**The following outlines our approach to prevent modern slavery and human trafficking and ensure human rights. The company will:**

- Not tolerate or condone abuse of human rights anywhere in our business, our supply chain, or partnerships
- Take seriously any allegations that human rights are not properly respected in our business and our supply chain
- Issue an annual Anti-Slavery and Human Trafficking Statement for relevant Reconomy Group businesses
- Update and report on progress and actions taken to prevent modern slavery in our business and our supply chain
- Provide Anti-Slavery training for all key Group staff particularly those involved in Supplier Management, Commercial and Compliance
- Build our employees' and suppliers' awareness of human rights, encouraging them to speak up, without fear of retribution, about any concerns they may have
- Consult with the Charity Hope for Justice in the UK (0300 008 8000), if modern slavery was suspected, asking them for advice on the steps to take
- If modern slavery was identified, we have a clear escalation process. The senior Supplier Manager takes the lead supported by the Group Compliance Lead on Modern Slavery and the Chief Operations Officer would be informed. We would refer to the Police and seek advice (in the UK) from the NGO Unseen helpline 0800 0121 700 and report via the [Unseen modern slavery website](#). [Hope for Justice](#) can provide support to ensure that the victim(s) are placed at the centre of decision making
- Expect all suppliers to be compliant with the Modern Slavery Act 2015, and encourage them to make a statement irrespective of turnover
- Provide clear guidance on preventing modern slavery for our existing and new suppliers that is publicly available on our website
- Undertake a 'heat map' of preferred suppliers to understand the risk and focus efforts
- Make all suppliers aware of modern slavery risks at point of onboarding through our terms and conditions, code of practice and supplier guidance
- Ask suppliers to outline their approach to managing the risk of modern slavery
- Assess our preferred suppliers on site every 6 months
- Undertake Risk or Threat Assessments from customers as required.

### 3 REVIEW

This policy will be reviewed annually, or more frequently should legislation, internal processes or industry practices change.

*Signature:*

**Name of Signatory:** Guy Wakeley  
**Position:** Chief Executive Officer  
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