

# Anti-Slavery and Human Trafficking Policy

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## INTRODUCTION

VecoAuto values human rights and are committed to ensuring that all business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. It is vital for us to maintain this reputation as it generates confidence in our business.

The Modern Slavery Act 2015 is an Act of Parliament of the United Kingdom and applies to all Total Waste Management operations within the Company.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as

- slavery, servitude (coercing someone to provide services) and forced and compulsory labour
- human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
- committing any offence with the intention to commit human trafficking;
- aiding, abetting, counselling or procuring any of the above offences,

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. The Company has a commitment to conduct its business and all its relationships based on integrity.

## POLICY

This Anti-Slavery and Human Trafficking Policy (Policy) applies to all directors, officers and employees collectively "you", of the Company who are employed by VecoAuto. This Policy should also be read in conjunction with the Code of Business Conduct and Ethics (the Code) which serves as a guide for how to conduct yourself as a member of the Company's team.

### **Zero tolerance approach to slavery and human trafficking**

The Company has a zero-tolerance approach to all forms of modern slavery and human trafficking within its business and within its supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in its own business or in any of its supply chains.

The Company have overall responsibility for ensuring this Policy complies with our legal and ethical obligations and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given appropriate training on it and the issue of modern slavery and human trafficking in supply chains.

## COMPLIANCE WITH THIS POLICY

Anyone working on the Company's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and suppliers must read, understand and comply with this Policy.

The prevention, detection and reporting of modern slavery in any part of the Company's businesses and supply chains is the responsibility of all those working for it or under its control. Those working on the Company's behalf are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

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You must notify a Director of the Company or the Company's Legal Department as soon as possible if you believe or suspect that a conflict with this Policy has occurred or may occur in the future.

Staff are encouraged to raise concerns about any modern slavery likely in any parts of the Company's supply chains in any supplier tier at the earliest possible stage.

### REPORTING

Internal reporting is critical to the Company's success and it is both expected and valued. You are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that you become aware of. Complaints will be kept confidential and will be dealt with appropriately. You will not experience retribution or retaliation for a complaint made in "good faith".

If a member of staff believes that a breach of this Policy has occurred or is likely to occur, they must notify their manager and the Company's Legal Department as soon as possible. If the staff member is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, it should be raised with their manager and the Company's Legal Department.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any staff member believes that they have suffered any such treatment, they should inform the Company's Legal Department immediately.

### COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this Policy and on the risk our business faces from modern slavery in its supply chains will be provided annually (and as otherwise necessary).

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### BREACHES OF THIS POLICY

Any employee who breaches this Policy by engaging in or conspires to engage in any modern slavery conduct or human trafficking will face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and if warranted legal proceedings may be brought against you. The Company may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this Policy.

### APPROVAL FOR THIS STATEMENT



This statement was approved by the  
Managing Directors on 08 April 2022



Reviewed by Compliance Manager John  
Robinson Dated: 08 April 2022