

## Modern Slavery and Human Trafficking Statement

This statement applies to Shred-on-Site Ltd (referred to in this statement as 'The Organisation'). This statement sets out the steps that the organisation has taken to ensure that modern slavery and human trafficking is not occurring in our organisation or in our supply chains.

### Organisational structure and activities

The organisation is based at Camberley, with satellite offices in Bury & Bicester. The organisation has field-based staff who work offsite at customer locations but regularly attend the offices.

The organisation is controlled by its owners and board of directors.

The main activity carried out by the Organisation is the shredding & recycling of confidential information and sensitive items.

### Definitions

Modern Slavery is a term which encompasses slavery, servitude and forced or compulsory labour.

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Human trafficking is defined as arranging or facilitating the travel of another person with a view to that person being exploited.

### Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

Labour is usually employed directly by the organisation at its aforementioned offices. Staff work and are employed solely in the UK.

### Supply chains

The supply chain of the Organisation includes various providers who supply shredding & recycling of confidential information and sensitive items where the Organisation does not deliver those services directly. All products are sourced directly by ourselves and purchased from UK businesses.

We understand that the Organisation's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour. We will assess any instances of non-compliance on a case-by-case basis and will then tailor remedial action appropriately. We will only trade with those who fully comply with this policy or those who are taking verifiable steps towards compliance. Where our first-tier suppliers are intermediary traders we ask that they ensure lower-tier suppliers are compliant with this policy.

### Potential exposure

The Company has considered where / whether there is a risk in the Organisation, or its supply chain, of slavery and human trafficking taking place. In general, the Organisation considers its exposure to slavery/human trafficking to be low. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it as noted below:

- The Organisation is committed to employing Employee's directly and not via third party agencies to ensure there is visibility of the employment relationship, and no risk of inadvertently recruiting staff from a third party which engaged in slavery or Human Trafficking.
- In rare instances where there is a business need to recruit staff via a third party (i.e. from a recruitment or temporary employment agency) only reputable service providers are engaged and our expectations in relation to this policy are communicated to them.
- Employees and workers are paid directly to their individual bank accounts, and no identification or travel documents are held by the Company.
- All members of the Organisation supply chain are asked to produce a Modern Slavery and Human Trafficking Statement to ensure there is a shared and joined up approach to avoiding acts of trafficking or slavery.
- Working practices of suppliers will be audited from time to time to include the commitments made in the supplier's Modern Slavery and Human Trafficking Statement.
- We do not source from high-risk countries where modern forms of slavery are prevalent.

### Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

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, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewed its supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- put measures in place to identify and assess the potential risks in its supply chains
- created an action plans to address risk to modern slavery
- taken steps to embed a zero-tolerance policy towards modern slavery
- provided training to relevant staff on modern slavery
- Sought evidence from our suppliers of the steps they have taken to ensure modern slavery has not taken place.

### Approval

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

This statement has been approved by the Company's Directors and Adam Chandler has been appointed as the Director with overall responsibility for compliance with the Modern Slavery Act 2015.

Signed: 

Name: Adam Chandler

Position: Managing Director

Last Review Date: January 2024

Next Review Date: January 2025