

# **Blue Phoenix Limited Modern Slavery and Human Trafficking Statement**

**HR BPL 024**

## Modern slavery and human trafficking Statement

### Introduction

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

The business is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This statement sets out The Company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains

### Company structure and supply chains

The Company provides full Incinerator Bottom Ash (IBA) processing solutions to Energy from Waste facilities. The IBA is processed into metal or aggregate products. We have employees, sub-contractors, agents, business partners and trade suppliers, whom are typically working with the Company under short or long term contracts.

#### *Countries of operation and supply*

The Company currently operates predominantly in the UK, but the supply chain extends to the following countries: Europe.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

#### *Responsibility*

Responsibility for the Company's anti-slavery initiatives is as follows:

**Risk assessments:** Make assessment of suppliers and customers of their business from publicly available data to satisfy ourselves as much as possible with such limited information that people in our supply chain are not exploiting people.

## Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** the business encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the business. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The business's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact their line manager or a director of the company
- **Employee code of conduct** the business's code makes clear to employees the actions and behaviour expected of them when representing the business. The business strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Recruitment policy** the business uses only reputable sources, including employment agencies local newspapers and Social Media Sites, to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

## Due diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- construction of the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier;

## Communication and Awareness of this Policy

The Company has raised awareness of modern slavery issues through various methods, including Toolbox Talks, covering the following;

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the company.

## Breaches of the Policy

We may terminate our relationship with other individuals and Companies working on our behalf if they breach this policy.

## Board Member Approval

This statement was approved on 1<sup>st</sup> of April 2021 by the Company's Board of Directors

**Statutory director's signature(s):**

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**Name:**

**David York**

**Function:**

**Statutory Director & Chairman, Blue Phoenix Limited**

**Date:**

**1<sup>st</sup> April 2021**

Appendix 1

Suppliers Letter MT54

Appendix 2

Suppliers Questionnaire MT54a