



PriorityWaste®
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Priority Waste – Modern Slavery and Human Trafficking Policy

Title: Modern Slavery and Human Trafficking Policy

Version: 2.0

Effective Date: 28 October 2025

Department: Operations / Compliance

Approved By: Nikolay Tovirov – Operations Director

Next Review Date: 28 October 2026

1. Policy Statement

1.1 Modern slavery is a serious crime and a violation of fundamental human rights. It encompasses slavery, servitude, forced and compulsory labour, debt bondage, and human trafficking. All involve depriving an individual's liberty or exploiting another person for personal or commercial gain.

1.2 Priority Waste has a **zero-tolerance approach** to modern slavery and human trafficking. We act ethically and with integrity in all our business relationships and implement robust systems and controls to ensure that modern slavery is not taking place anywhere within our operations or supply chains.

1.3 We are committed to transparency and to meeting our disclosure obligations under the **Modern Slavery Act 2015 (as amended)** and the **Procurement Act 2023**, as well as aligning with current UK Government guidance on transparency in supply chains.

1.4 We expect the same high standards from all contractors, suppliers, and business partners. 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 adult or child. Suppliers are required to cascade these standards through their own supply chains.

1.5 This policy applies to all persons working for or on behalf of Priority Waste in any capacity, including employees at all levels, directors, agency workers, contractors, consultants, volunteers, third-party representatives, and business partners.

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

2. Responsibility for the Policy

2.1 The **Operations Director** has overall responsibility for ensuring this policy complies with legal and ethical obligations and for ensuring all those under our control comply with it.

2.2 The **General Manager and Department Managers** have day-to-day responsibility for implementing this policy, monitoring its effectiveness, dealing with queries, and auditing systems and controls to ensure they are effective in preventing modern slavery.

2.3 All managers are responsible for ensuring their teams understand and comply with this policy and receive adequate and regular training on identifying and preventing modern slavery risks in supply chains.

2.4 Comments, suggestions, and improvement proposals regarding this policy should be directed to the **Head of Procurement** or **Compliance Officer**.

3. Compliance and Due Diligence

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

3.2 Preventing, detecting, and reporting modern slavery in any part of our operations or supply chains is everyone's responsibility.

3.3 All employees and contractors must avoid any activity that might lead to, or appear to lead to, a breach of this policy.

3.4 Priority Waste operates an enhanced **Supplier Due Diligence and Risk Assessment** process. Before approval or renewal, all suppliers are required to:

- Confirm compliance with the Modern Slavery Act 2015.
- Complete a Supplier Self-Assessment Questionnaire covering labour practices, recruitment, and subcontracting.
- Provide evidence of training, whistleblowing, and grievance procedures.

3.5 Managers must notify the **Head of Procurement** immediately if a supplier fails to provide sufficient assurance or evidence of compliance.

3.6 Where appropriate, site audits or follow-up investigations may be undertaken for higher-risk suppliers or subcontractors.

4. Reporting Concerns and Whistleblowing

4.1 All employees are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest opportunity.

4.2 Concerns should be reported to the employee's line manager, the **Head of Procurement**, or in accordance with the **Whistleblowing Policy**.

4.3 Priority Waste encourages openness and will support anyone who raises a genuine concern in good faith, even if it proves to be unfounded.

4.4 No employee will suffer dismissal, disciplinary action, threats, or other detriment for reporting a concern. Any form of retaliation will be treated as a serious disciplinary offence.

4.5 If you believe you have been treated unfairly for raising a concern, report this immediately to the **Head of Procurement**. If unresolved, you may raise it formally under the **Grievance Procedure**.

5. Communication and Awareness

5.1 All new employees receive training on this policy as part of their induction. Refresher training will be provided annually or when significant changes occur.

5.2 This policy and our **zero-tolerance approach** must be communicated clearly to all suppliers, contractors, and business partners at the start of our relationship and reinforced regularly thereafter.

5.3 Copies of this policy are available on request and published internally for staff reference and externally via our company website to demonstrate transparency and accountability.

6. Breaches of this Policy

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

6.2 Priority Waste may terminate its relationship with individuals, suppliers, or organisations acting on its behalf if they are found to have breached this policy or failed to provide adequate assurance of compliance.

7. Continuous Improvement

Priority Waste is committed to continuous improvement in identifying and mitigating risks of modern slavery. We will:

- Review and update this policy annually.
- Include modern slavery compliance within supplier audit criteria.
- Monitor relevant legislation and government guidance to maintain alignment with current best practice.

Nikolay Tovirov

Operations Director