

Anti-Slavery and Human Trafficking Policy

1. Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that Northern Trading (Cumbria) Limited has taken to prevent modern slavery and human trafficking within our business operations and supply chains.

We are committed to acting ethically, with integrity, and with transparency in all business dealings. We maintain a zero-tolerance approach to modern slavery and expect the same high standards from all those we work with.

2. Our Business and Supply Chains

Northern Trading (Cumbria) Limited operates within the **waste management, waste brokerage, and haulage sector**, arranging and managing the collection, transport, treatment, and disposal of waste materials.

Our operations are supported by a supply chain of waste carriers, treatment and disposal facilities, subcontract hauliers, plant and equipment providers, fuel suppliers, and professional service providers.

Our suppliers are predominantly based in the UK, with a core group of key suppliers representing the majority of our operational expenditure.

While we consider our exposure to modern slavery risk to be relatively low due to the geographic profile of our supply chain, we recognise that the **waste, recycling, logistics, and haulage sectors can present elevated risks**, particularly where subcontracted labour, agency workers, or lower-skilled manual roles are involved. We therefore remain vigilant and committed to ongoing risk assessment and mitigation.

3. Our Policies

We have implemented an Anti-Slavery Policy which reflects our commitment to:

- Preventing modern slavery and human trafficking in our operations and supply chain
- Acting ethically and with integrity in all business relationships
- Implementing and enforcing effective systems and controls

This policy applies to all employees, drivers, contractors, subcontract hauliers, suppliers, and business partners.

We also support this commitment through related internal policies, including:

- Sustainability Policy
 - Sustainable Procurement Policy
 - Corporate Social Responsibility Policy
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4. Risk Assessment and Due Diligence

We take a proactive approach to identifying and managing modern slavery risk within our operations and supply chain. Our processes include:

- Assessing suppliers, subcontract hauliers, and waste contractors during onboarding
- Verifying relevant licences and regulatory registrations (e.g. waste carrier and environmental permits)
- Requiring suppliers to confirm compliance with the Modern Slavery Act 2015
- Including anti-slavery and ethical working provisions within contractual agreements
- Conducting ongoing supplier review and requalification processes

We expect our suppliers and subcontractors to uphold the same standards and to apply these principles within their own supply chains.

5. Supplier Standards and Controls

We operate a clear and robust zero-tolerance approach to non-compliance.

Our expectations of suppliers and subcontractors include:

- Prohibition of forced, compulsory, bonded, or trafficked labour
- Compliance with all applicable employment, wage, and working time legislation
- Use of legitimate employment practices and properly documented workers
- Flow-down of anti-slavery requirements within their own supply chains

We reserve the right to take appropriate action, including suspension or termination of contracts, where suppliers fail to meet these standards.

Contingency arrangements are in place to ensure operational continuity in the event of supplier non-compliance.

6. Training and Awareness

We recognise that awareness is critical in preventing modern slavery, particularly within operational and logistics environments.

We provide training and guidance to employees, including:

- Toolbox talks and briefings for operational staff and drivers
- Information on recognising the signs of labour exploitation and modern slavery
- Guidance for managers responsible for supplier engagement

- Clear reporting procedures for raising concerns

We are committed to strengthening and expanding training provision to ensure relevant employees receive appropriate and regular updates.

7. Reporting and Whistleblowing

We promote a culture of openness and accountability.

Employees, subcontractors, suppliers, and other stakeholders are encouraged to report any concerns related to modern slavery or labour exploitation.

We ensure that:

- All concerns are taken seriously and investigated appropriately
- Individuals raising concerns are protected from victimisation or retaliation

Responsibility for overseeing compliance sits with our Compliance Officer, who is accountable for monitoring, reporting, and escalation of issues related to modern slavery.

8. Measuring Effectiveness

To assess the effectiveness of our approach, we monitor:

- Supplier and subcontractor compliance during onboarding and periodic review
- Verification of licences and regulatory status where applicable
- Training delivery and employee awareness levels
- Any reported incidents, concerns, or corrective actions

We are committed to continuous improvement and will develop measurable key performance indicators as our systems and controls evolve.

9. Governance and Approval

This statement has been reviewed and approved by the Board of Directors of Northern Trading (Cumbria) Limited and will be reviewed annually.