

# **Human Rights & Modern Slavery Statement**

This information in this statement, which is signed by our joint Managing Directors, Laura Carter, and Robert Booth, applies to Slicker Recycling Limited, and Slicker Interceptors and details the policies, processes, and actions Slicker Recycling (incorporating Slicker Interceptors) has taken to mitigate the risk of modern slavery and human trafficking in our supply chains and any part of our own business. The information included in the statement refers to the year 2022, required under the provisions of the Modern Slavery Act 2015 (the "Act").

### **Organisational Structure**

Slicker Recycling is one of the UK's leading hazardous waste management companies and is the UK's largest collector and processor of used waste lubricating oil. Our expert teams offer total waste management solutions to an extensive customer base across the whole of the UK and Ireland.

We operate over two divisions of the business – Slicker Recycling and Slicker Interceptors and have various transfer stations and plant locations across the UK, including Kingsnorth, Hull, and Newport. Our head office is based in Stourport on Severn.

We work in partnership with a wide range of customers from sectors including automotive, plant & tool hire, facility management, retail, manufacturing, construction, agriculture, the public sector and much more. We ensure that waste is stored, managed, and disposed of appropriately for our customers in full compliance with the latest regulations.

Our strategy is focused on growth and continuous improvement. Since the launch of Slicker in 2016 we have completed four acquisitions and have remained focused on driving the business forward to an even stronger position. Having traded well throughout the pandemic we are in an excellent position for further growth.

Our 200 employees operate within a fast-paced, busy working environment. We work hard, but we also enjoy what we do and being part of a tight-knit team. As a business we have big ambitions; it is an exciting time to be part of Slicker.

## **Our Values**

Our core values are central to what we do; Reliable - Fun - Honest - Together - Smart.

At Slicker, creating a happy and content place of work for our colleagues is paramount, and we strive to do this in many ways. Where possible, we look to offer promote colleagues from within the business, ensuring they are recognised and rewarded for their hard work and dedication. We also provide constructive feedback and praise through regular one-to-one meetings.

#### **Definitions**

Slicker Recycling 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 of 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.

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#### **Our Commitment**

At Slicker Recycling, are committed to playing our role by ensuring that through our management and operations we have the systems, policies, and processes in place to identify any potential instances of exploitation and, if found, eradicate modern slavery in all its forms from our business and supply chain. We understand that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Slicker Recycling does not enter 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 Slicker Recycling in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. We strictly adhere 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 employee.

#### **Suppliers and Supply Chain**

With Slicker Recycling's suppliers, we recognise that our supply chain is critical to our success and is also primary risk area. We therefore seek to build lasting relationships, treating our suppliers fairly and paying promptly. We want to work with suppliers who share our values and support us in delivering our purpose to create better outcomes.

- 1. Supplier Code of Conduct: We have developed a comprehensive Supplier Code of Conduct that sets out our expectations regarding labour rights, human rights, and ethical practices. We require all our suppliers to adhere to these standards and regularly evaluate their compliance.
- 2. Supplier Risk Assessment: We conduct risk assessments of our suppliers to identify potential risks related to modern slavery and human trafficking. This helps us prioritize our resources and focus on suppliers in higherrisk regions or industries.
- Supplier Audits: We conduct regular audits of our suppliers to verify compliance with our Supplier Code of Conduct. These audits are carried out by trained professionals who assess labour practices, working conditions, and other relevant factors.

#### **Risk and Assessment Management**

In general, we consider Slicker Recycling's exposure to slavery/human trafficking to be relatively limited. 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. We partner with organisations which share our values and support responsible business practice, including modern slavery, activities.

### **Training and Communication**

To make colleagues aware of the Act, we share this statement with all colleagues through our internal communication channels and a copy of this statement is available on Slicker Recycling's website (www.slickerrecycling.com). We continue to provide awareness training on our policies for all colleagues via our digital provider and will be launching more detailed training for colleagues that have been identified as having responsibilities in this regard, namely those involved in finance and procurement.

We seek feedback from colleagues through our annual Colleague Survey, which is sent to all Slicker Recycling employees.

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The business also communicates with all our colleagues regularly, this includes group-wide communication, management roadshows and digital training, as well as divisional and local communication.

Our Supplier Relationship Management Framework enables the close management and monitoring of our supplier compliance to our Policies, Supplier Charter and applicable legislation and regulation. We assess our supplier's performance across four key Responsible Business themes:

- Environment
- **Ethics**
- Sustainable procurement
- Labour and human rights

2022 has seen continued coverage across our supply chain of tracking and monitoring KPI's relating to modern slavery.

#### **Key Performance Indicators (KPIs)**

We do not have any Key Performance Indicators (KPIs) to measure effectiveness of steps being taken at this time but will look to start measuring and reporting on KPIs relating to training and due diligence activities in the future.

#### **Our Policies**

We are committed to doing the right thing by ensuring we respect human rights and the environment. Slicker Recycling has the following policies which further define its stance on modern slavery:

- **Grievance Policy**
- **Human Rights & Modern Slavery Statement**

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- Code of Conduct Policy
- **Equality and Diversity Policy**
- **Recruitment Policy**
- Whistleblowing Policy

Slicker Recycling's commitment includes the provision of a clear approach to raising a grievance, communicated to all colleagues, and that all issues raised will be dealt with fairly and consistently to avoid any claims of discrimination or unfair treatment. Investigations are fully managed, and all hearings held promptly. There is also a fully documented appeal process, with transparent steps in a fully documented Grievance Procedure easily available and accessible to all.

Date of approval:

Signed:

Print name: Laura Carter / Robert Booth Job Title: Joint Managing Directors

Document Approved by: Joint Managing Directors

Date: May 2023

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