

MODERN SLAVERY STATEMENT 2025

INTRODUCTION

Modern slavery is a crime and violation of fundamental human rights. It is a term used to encompass slavery, forced and compulsory labour, child labour and human trafficking.

Cumbria Waste Group is committed to the principles of the Modern Slavery Act 2015, taking a zero-tolerance approach to tackle and prevent forms of modern slavery from occurring within our businesses and supply chains.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps we have taken to prevent and address modern slavery in our operations and supply chains in the financial year ending 31st March 2025.

BUSINESS, ORGANISATION STRUCTURE & SUPPLY CHAINS

Cumbria Waste Group is the collective trading for operating groups of the following subsidiary companies: Cumbria Waste Management Ltd, Cumbria Waste Recycling Ltd, Derwent Recycling Ltd and Wicks Services Ltd, operating in waste management.

The Head Office is based in Carlisle and provides support to its employees throughout Cumbria and the North of England. The Group directly employs over 400 people and looks after a large customer base.

Our business is underpinned by our values, which is reflected in the behaviours we want to be known for. We run our business with integrity and act responsibly to make Cumbria Waste Group a great place to work and to do business with.

The majority of our external suppliers are in low-risk sectors and occasionally use we temporary labour suppliers where the risk of modern slavery is higher.

We are committed to reducing our carbon footprint and procure locally where possible, rationalising our supplier base and reducing our distribution network. Our commitment to quality assurance across the business coupled with the close working relationships with our suppliers has enabled legislative compliance, quality accreditation and the adoption of safe working practices.

GOVERNANCE & RELEVANT POLICIES

Our values and behaviours guide our actions and behaviours with clear expectations set out in policies which are available to all employees.

We have a number of policies and procedures in place that reflect the way we do business and set out expectations to our employees. These policies visibly reflect our commitment to responsible business policies and practices that are fair, transparent, and inclusive.

Our relevant policies and procedures include:

- Employee Handbook
- Anti-Bribery
- Business Ethics
- Recruitment and Selection
- DBS
- Dignity at Work
- Speaking Up
- Whistleblowing

Our people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from abuse or coercion.

Our recruitment procedure outlines the mandatory requirements we conduct to ensure any new applicant is suitable for the role they have applied for. All our people undergo identity and Right to Work checks prior to commencing employment and further vetting checks were applicable (i.e. CRB). We employ most of our people directly with checks in place to ensure that payment of salary is made direct to that person.

We are committed to maintaining an open culture with the highest standards of honesty and accountability, a culture where colleagues can report any legitimate concerns in confidence. Our Whistleblowing policy outline the process to raise a concern about wrongdoing, safe in the knowledge that it will be investigated promptly and effectively. We undertake to protect our people from any victimisation, harassment or bullying which may result from disclosure.

DUE DILIGENCE & RISK MANAGEMENT

To help make more informed purchasing decisions, sustainability risk criteria, including human rights and employment practices are fully integrated into the sourcing process. We have developed a risk-based approach to supplier categorisation of goods and services, which will be reinforced to include a modern slavery supplier risk assessment and expand due diligence for critical suppliers.

All Cumbria Waste Group suppliers will be expected to implement a zero-tolerance approach to slavery, forced labour and human trafficking and comply with all local and national laws and regulations.

We identify trustworthy suppliers who have the same ethical practices. Each supplier compliance is assessed through a suite of due diligence checks which includes a statement of compliance with our contractor questionnaire, to identify potential areas of risk within the supply chain and ethical trading.

If a risk is identified, we will act upon it, and – when it is considered appropriate – work collaboratively with our suppliers/contractors to develop corrective action plans in order to remedy shortcomings and raise standards over time.

In the event that a supplier/contractor is unwilling or unable to address any identified actual or potential issues, or an issue is identified as critical in nature, then the Company reserve the right to take rapid and emphatic steps which could include termination of any and all agreements in existence.

EFFECTIVENESS

We use key performance indicators (KPI's) to measure how effective we have been in communicating awareness of our core policies and procedures related to the requirements of the Modern Slavery Act, and our actions to seek slavery and human trafficking is not taking place in any of our businesses or supply chains.

In the financial year ending March 31st 2025, we had no reported incidents of modern slavery or human trafficking in our operations.

We will continue to review KPIs and continue to

- regularly review and improve our supplier risk assessment processes.
- engage with stakeholders to promote human rights and the prevention of modern slavery.
- develop our policies to support ethical behaviour.
- educate and promote a “speaking up” culture within our business, encouraging all of our employees or those working on our behalf to raise any concerns.

TRAINING AND AWARENESS

We continue to strengthen employee awareness of our stance on slavery and human trafficking so they understand the issues involved, become more aware of the risks, the signs to be vigilant of and how to raise awareness should they see or fear something suspicious.

We believe improved awareness is one of the most effective methods to reduce the risk of modern slavery and with the help of our employees and suppliers we aim to ensure there are no opportunities for forced labour to exist within our business or our supply chain.

Our Employee Handbook sets out our key policies and procedures. We give all our people access to the Handbook and are issued with copy when they begin working for Cumbria Waste Group.

The Handbook provides our people with the guidance and support necessary to carry out their work in the right way. Our Handbook is designed to help our people understand the group's values and the behaviours that underpin them.