

## Slavery and human trafficking statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending 2023.

### Introduction

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Ward is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

Our organisational structure and operations

Ward is a provider of recycling services and goods working in the waste and metal recycling industry. We employ 420 people and operate in across the entire UK. We have an annual revenue of 300 million pounds.

Nature of our supply chains

Our key supply chains involve receiving recyclable metal and waste products. We operate nationally with processing sites throughout the UK. All suppliers are responsible for ensuring they adhere to local and national laws relating to the product they sell us. We also ship our product internationally – we follow all local laws relating the production, sale and movement of our product as well as ensuring the staff involved in all levels are working legally and freely.

Policies relating to slavery and human trafficking

Our Anti-slavery policy (as well as our CSR, Sustainability Policies, published in autumn of 2020) reflects our commitment, implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains, and to acting ethically and with integrity in all our business activities and relationships.

We ensure that our suppliers are aware of our policies.

Due diligence processes in relation to slavery and human trafficking

Due to the nature of our business in terms of how we collect and obtain recycling materials for production we cannot necessarily monitor where the goods we are receiving are manufactured or produced. We can ensure our direct suppliers do not fall into a high risk category for human trafficking and also ensure our policy and statement are available publicly.

Ref: HROrg003	UNCONTROLLED WHEN PRINTED	Author: Katie Brown
Version: 3	Page <b>1</b> of <b>2</b>	Date: 04.06.2022

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# Staff training

We ensure that staff understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk.

We make specific provision in our whistleblowing policy for the protection of those who whistle-blow in relation to an issue of modern slavery.

Monitoring of our anti-slavery policy

We will review our policy and statement on an annual basis to ensure it adheres to the Modern Slavery Act 2015.

Signed by: James Balfour (on behalf of Ward)

Signature:

Date: 07.06.2022

Ref: HROrg003	UNCONTROLLED WHEN PRINTED	Author: Katie Brown
Version: 3	Page 2 of 2	Date: 04.06.2022

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