



MODERN SLAVERY ACT STATEMENT

Red Industries Group

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes The Red Industries Group's modern slavery and human trafficking statement for the financial year ending 31st December 2020.

Red Industries is committed to ensuring modern slavery and human trafficking is not present in our workforce or supply chains or any part of our business. We work to develop and implement controls and systems to mitigate the risk of human abuse violations, in any form, anywhere within our business or supply chain. We operate a zero-tolerance policy in this regard.

Structure, Business, and Commitment

Organisation Structure

The Red Industries Group includes the following trading subsidiaries of Oliver Grace Ltd:

- Red Industries (Stoke) Ltd
- Red Industries (Brownhills) Ltd
- Red Industries RM Ltd
- Red Industries IS Ltd

These companies are referred to as 'Red Industries', 'Red', or 'Red Group'.

Red Industries is a waste management and environmental services provider. We operate several waste facilities in Staffordshire and the West Midlands, including treatment and transfer stations, industrial cleaning hub, and non-hazardous landfill. We work with clients across a range of industries within the UK.

Our Supply Chains

We work with a number of suppliers in the UK and abroad (our suppliers are primarily based in Europe). Our suppliers may be recruitment agencies, logistics companies, equipment and part suppliers, service providers, waste processors and other suppliers as required to meet the needs of the business.

Our Commitment to the Principles of the Modern Slavery Act 2015 & Due Diligence

Red Industries is an equal opportunities employer, committed to creating and ensuring a non-discriminatory and respectful working environment for our employees.

Employees

We have procedures in place to help us address the risk and ensure all prospective employees are legally entitled to work in the UK. We carry out several checks on potential and new employees, including confirming the person's identity, carrying out Right to Work checks, obtaining references and paying wages into a personal bank account.

The majority of our workforce is employed directly, however in some areas we do use agency staff. We recognise that this is an area where human trafficking and slavery is a higher risk – we work closely with selected and reputable agencies and require suitable checks to be carried out by the agency prior to the person starting work. We also look to transfer agency staff onto permanent contracts of employment wherever suitable and feasible. Our business operates year-round without the need for specific 'seasonal workers' or irregular unskilled workers.

We recognise that people are the cornerstone of Red's success. We value our diversity as a source of strength. We are proud of Red's history of treating employees with respect and dignity and are committed to building upon this tradition. We listen to the ideas of our colleagues and respond appropriately. We seek a



business environment that fosters personal and professional growth and achievement. We recognise that communication must be frequent and candid and that we must support others with the tools, training and authority they need to succeed in achieving their responsibilities, goals and objectives.

Supply Chain

Red Industries does not enter into business with any organisation which knowingly supports or is found to be involved in slavery, human trafficking, servitude, or compulsory labour. Should any failure to comply with the Modern Slavery Act 2015 be found, use of that supplier/ contractor would be immediately terminated.

As part of our Purchasing Procedures, the vetting of suppliers by a competent person(s) is required. Suppliers are also reviewed at periodic intervals, which may include supplier audits.

Policies and Procedures in Relation to Slavery and Human Trafficking

We operate an integrated Management System and are committed to operating to the highest standards – we hold ISO 14001, ISO 9001, and OHSAS 18001/ ISO 45001.

We operate several policies and procedures, which are available to all employees. These policies and procedures ensure we are conducting business in a transparent and ethical manner and with integrity. Our policies are enforced and are renewed as required.

- Modern Slavery Policy
- Antibribery and Anti-Corruption policy
- Employee handbook
- Whistleblowing Policy
- Equal Opportunities Policy
- Purchasing Procedure
- Recruitment Procedure

Our policies and procedures reflect our commitment to integrity and acting ethically in all our activities. The systems we have in place, including our policies and procedures, minimise the risk of human trafficking or modern slavery occurring within our business or supply chain.

Our vision and mission statement sets out the aims of the business including social responsibility.

Training for Employees

A copy of this policy is made available to all employees and all new entrants upon joining the Company new entrants undertake an e-learning module in connection with Modern Day Slavery.. The Red Group's HR department are aware of the risk involved regarding employment and are involved in all recruitment and inductions.

If issues are identified in relation to Modern Slavery, these would be dealt with by our HR department and Board of Directors.

On-going Improvements

We're committed to continued improvement. In relation to Modern Slavery, over the course of the year we intend to: review and update this statement, evaluate our supply chain and risk of modern slavery, continue to train our employees and make them aware of their obligations with regard to Modern Slavery.

Review and Approval of the Statement

This statement has been reviewed and approved by the Board of Directors.

1 March 2021