



ISL Waste Management Ltd has a zero-tolerance approach to modern slavery and human trafficking both within the organisation and throughout our supply chain.

Our Code of Conduct states that ISL Waste Management Ltd is vehemently opposed to the use of slavery in all forms, cruel, inhuman or degrading punishments and any attempt to control or reduce freedom of thought, conscience and religion. We will ensure that all our employees, contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights. We support and respect the protection of human rights within our sphere of influence in particular the effective elimination of compulsory labour and child labour.

This Code of Conduct applies to all ISL operations and employees. ISL Waste Management expects equivalent standards of conduct from all persons acting on its behalf such as suppliers and partners.

1. PURPOSE OF THIS POLICY

1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out policy of ISL with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chains.

1.2 In ISL we have a zero-tolerance approach to modern slavery across all areas of our organisation as well as in our supply chains. 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 businesses or those of our suppliers.

2. STEPS FOR PREVENTION OF MODERN SLAVERY

2.1 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. We are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude whether adults or children. We require our suppliers to hold their own suppliers to the same high standards.

2.2 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:

- a) Identify and assess potential risk areas in our business and supply chains.

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- b) Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- c) Monitor potential risk areas in our business and supply chains.
- d) Introduce additional procedures to understand measures taken by them to ensure modern slavery is not occurring in their businesses and their supply chain.
- e) Encourage the reporting of any wrongdoing through internal, external or anonymous whistleblowing procedures

a. Internal

- Made employees aware of the Modern Slavery Act, including its definitions of slavery and human trafficking;
- Employees are encouraged to raise any concerns about suspected modern slavery associated with ISL or our suppliers and should do this through their line manager.

b. External

Members of the public or people not employed by ISL to write, in confidence, to the ISL HSE Co-ordinator (either via e-mail: danny@islwastemanagement.co.uk or to the registered office) to raise any concerns, issue or suspicion of modern slavery in any part of our business or related supply chains.

c. Anonymous

ISL will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

- Protect whistle-blowers

3. RESPONSIBILITY FOR THE POLICY

3.1 Ultimate responsibility for the prevention of modern slavery rests within the ISL's leadership. ISL Managing Director has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

3.2 Managers at all levels are responsible for ensuring those reporting to them:

- understand and comply with this policy; and
- are given adequate and regular training on it and the issue of modern slavery.
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4. SUPPLIER ADHEREANCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chains and contractors comply with our values, we have in place a supply chain compliance programme. This consists of:

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- Standard clauses in sub-contractor form
- Self-certification of compliance where applicable

5. TRAINING

To ensure high level of understanding of the risks of modern slavery and human trafficking in our organisation and our supply chains we have added a training programme to our staff.

6. BREACHES OF THIS POLICY

- 6.1 If an issue is suspected with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed time period.
- 6.2 We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

7. COMMUNICATION AND AWARENESS OF THIS POLICY

- 7.1 Our zero-tolerance approach to modern slavery has been communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

8. REVIEW

- 8.1 Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the ISL Board of Directors (at least annually) and may be amended if applicable.

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