

Modern Day Slavery and Human Trafficking Policy Statement

Acumen Waste Services acknowledges the provisions of the Modern-Day Slavery Act 2015. Slavery and human trafficking remains a hidden blight on our global society and Acumen believe that we all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them. The Company is satisfied from its' own due diligence and employment processes that there is no evidence of any act of modern day slavery or human trafficking within its' own organisation. We are equally committed to ensuring that there is no modern-day slavery or human trafficking in our supply chain. Our Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of our initiative to identify and mitigate risk, we will:

- Continue to require evidence of citizenship and eligibility for direct employment with Acumen
- Incorporate evidence of the same in our Supply Chain Approval Procedures
- Request a copy of Modern Slavery Statements from all suppliers having a turnover greater than £36 million.
- Share our ethos and Policy Statement with smaller, but equally important, suppliers.

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The Company Directors and Senior Management shall take the responsibility for implementing this policy statement and its' objectives and shall provide adequate resources (training etc.) and invest to ensure that slavery and human trafficking is not taking place within the organisation and its' supply chain.

This policy statement will be reviewed annually and published.

Signed and accepted on behalf of the company



Andrew Crossley
Managing Director
1st January 2022

Child labour policy

Introduction

The Acumen has developed this policy as a declaration of its commitment and responsibilities for protecting Young Workers and ensuring compliance with the United Nations International Labour Organization's Conventions (ILO) 138 and 182 relating to Child Labour.

At the outset, it should be noted that this policy applies to:-

- All Divisions within the Acumen.
- All our Suppliers as a condition of business. Suppliers are expected to demonstrate full compliance with this policy and accept their responsibilities under the remediation process. Suppliers are also required to monitor their own supply chains including labour providers.

For the operation of this policy the following definitions apply:

- **Child** - A "Child Worker" is defined as someone who has not reached their 15th birthday, or any higher age specified in local law for completing mandatory schooling or beginning full time work. The legal minimum age of work can vary depending on the country and so suppliers should seek guidance from national law.
- **Child Labour** – Is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to their social, physical and mental development. This refers to work that is mentally, physically, socially or morally dangerous and harmful to children, and interferes with their schooling. i.e. depriving them of the opportunity to attend school, obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.
- **Hazardous Work** - Any work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of Children. This includes: working with chemicals, machinery or electrics; working in confined spaces, at height or in excessively hot or cold conditions; being exposed to dust, fumes or loud noise; lifting or carrying heavy loads; working overtime or working at night.
- **Young Worker** - A young person who is legally entitled to work i.e. above the minimum age of employment of 15 and below the age of 18.

Acumen Policy Position

- We are committed to protecting the rights of Young Workers and remedying any instances of child labour.
- We will not engage in or condone the unlawful employment or exploitation of children in the workplace or the use of forced labour in our own operations or supply chain.
- No child is to be employed or engaged in the production of our products or the supply of materials or services to us.

Under the Management of Health and Safety at Work Regulations 1999 as an employer we must assess the risks to the health and safety of workers and any other persons who may be affected by their work activities.

The regulations also require that a specific risk assessment in relation to young workers is completed before a young person starts work. The risk assessment should take account of their inexperience; the layout of the workplace; any exposure to hazardous substances; the work equipment; the organisation of the processes and the extent of training to be given. Control measures must be present or introduced which eliminate or minimise any risks, so far as reasonably practicable.

There are certain types of work which young people should not be employed to do. We will not employ a young person for work:

- which is beyond his physical or psychological capability;
- involves exposure to harmful agents;
- involves harmful exposure to radiation;
- involving the risk of accidents which would not be recognised or avoided;
- involving risks from extreme cold / heat, noise or vibration.

We support the employment of Young Workers within the Group and our supply chain provided that they do not perform hazardous work and there are adequate precautions in place for their protection. These precautions includes:-

- Operating a robust procedure for age verification as part of the recruitment process to prevent the employment of child workers. This must be fully auditable based on documentary evidence.
- Undertaking a detailed risk assessment before employing a Young Worker to identify work that they can do safely.
- Providing appropriate training.

- Having sufficient management controls to ensure that the Young Worker follows safe systems of work and does not perform any form of hazardous work including working at night or overtime.
- We support formal work-based training or apprenticeship programmes that enable Young Workers to learn new skills. These programmes must be aimed at developing Young Workers' skills and experience and meet local legal requirements (where applicable) and subject to the above precautionary measures.
- Young Workers must be paid at least minimum wage for every hour worked including any training time.
- If a Young Worker is found to be performing hazardous work the following act on must be taken:
 - Immediately remove the Young Worker from the task where the hazard is present.

Child Labour and Remediation Process

- If it is suspected that an underage worker is employed at any of our sites or in the supply chain then immediate steps should be taken to verify the age of the individual against official documentary evidence.
- In the event that an underage worker/s is found working it is necessary to:
 - Act quickly and appropriately by removing the worker from the work area to ensure their safety.
 - Record the names, ages and contact details of the workers concerned.
 - Explain the legal requirements and restrictions on working ages to the child clearly and carry out an age verification check.
 - Consult with child focused organisations (e.g. Child Protection Services) and local authorities regarding any child allegedly or confirmed to be involved in child labour.
 - Terminate the employment relationship.
 - Treat each situation of child labour on a case by case basis to ensure the best interest of the child taking into account their specific needs and aspiration when drawing up the remediation programme.
 - The programme may include:-
 - Assisting them to find a school and support them financially

through their education (vocational training or formal education).

- Compensating the child's family for at least the wage they were earning. These wages will be paid monthly (not as a lump sum) until the child has reached the legal minimum age for working.
- At the end of the period of education guaranteeing paid employment to the child worker at the same level in which they were previously employed if they wish to return.
- Agreed monitoring period by Acumen.
- A full investigation should be carried out to identify how this has happened and action taken to prevent reoccurrence.
- In addition, there is an obligation on the following parties:-

- **Acumen designated contact** to notify immediately all relevant Customers where an underage worker has been found working at one of our sites or in our supply chain for their product.

The designated contact will also assume responsibility for the remediation process and will monitor the implementation and progress of the programme.

- **The Supplier** is required to notify immediately the relevant Acumen designated contact in the event of an underage worker being found working for them or a sub supplier.

The Supplier is also required to fulfil its responsibilities for financially supporting a remediation programme (as outlined above) by working together with Acumen to develop a responsible solution that is in the best interests of the Child; ensuring no

financial detriment to the child, their dependants, and no breach to their human rights. Providing this happens then Acumen will continue its business relationship with the Supplier.

Further Action

- We will write to the Supplier and take formal action if they do not demonstrate cooperation with this Policy.
- We reserve the right to discontinue the business relationship with any Supplier if they deliberately breach this policy or fail to demonstrate action towards an agreed remediation programme.
- We will regularly review and audit our own recruitment procedures to ensure compliance and reserve the right to carry out audits of our supply chain.

Signed and accepted on behalf of the company



Andrew Crossley
Managing Director
1st January 2022