

**This statement is made pursuant to section 54 (1) of the Modern Slavery and Human Trafficking Act 2015, and constitutes our company's Transparency Statement for the financial year 2020/2021**

**Interpretation:**

TM Waste Ltd understands modern slavery to be an intolerable and immoral abuse of basic human rights. We unreservedly subscribe to the interpretation of the Modern Slavery Act 2015 which characterises the offence(s) of Modern Slavery as

*"Servitude, and forced or compulsory labour, including human trafficking".*  
We further agree with the UK Home Office description of the offence as a *"Heinous crime that affects communities and individuals across the globe"*

**TM Waste Ltd organisational structure, its business and supply chain:**

TM Waste Ltd is a private limited company engaged in the following activities:

- Waste management

The business operates from its headquarters in Maghera and Portadown, through an officially constituted Board of Directors and hierarchical management structure. The business exists to service customer's needs in an economic, quality controlled and sustainable manner with the expectation that the company will make a reasonable and not excessive return on its financial and human capital deployed.

The supply chain exists to provide raw materials, transport and logistics, and the equipment necessary to provide our services. We endeavour to source our bought in goods and services from UK / European Union based companies whose lineage can be easily verified, and we aim to build long term relationships with our supply chain members such that we can confer trusted trader status on our supply partners.

**Policy in relation to modern slavery and human trafficking**

The TM Waste Ltd board of directors has adopted a zero tolerance policy to modern slavery and human trafficking in all its forms, and has extended this ethos to all supply chain partners. The business is totally committed to its published ethical code of conduct and all staff are expected to demonstrate by their words and actions compliance with the code. Failure to adhere to company ethos and code of conduct is normally regarded as a disciplinary offence.

**Due diligence process(es)**

- i. External procedures (including supply chain members)
  - All sub-contractors must pass positive vetting as part of our supplier accreditation procedures.
  - We expect our suppliers to have a published Slavery and Human Trafficking Transparency Statement (or equivalent) with ample evidence of its implementation and adherence.

- We will take all reasonable measures to ensure that external suppliers and third parties are aware of our ethical position. This will be done by giving our Transparency statement prominence on our web site and corporate literature.
- ii. Internal procedures
  - We have a job description and personnel specification for all substantive job within the business clearly setting out the requirements, attributes and training profile to discharge the duties.
  - All job vacancies must be advertised and administered by trained HR staff
  - Interviews to be conducted by a minimum of two panel members with objective scoring of the applicants' performance, and a scoring matrix to determine the successful applicant.
  - We independently verify the identity of successful applicants, and verify their right to live and work in the UK if appropriate.
  - We have a "whistle-blower" policy in place which encourages the anonymous reporting of areas of concern.
  - Company Internal Audit staff vouch all recruitment and staff welfare procedures as part of our ISO accreditation.
  - Company Internal Audit staff visit work sites as part of our ISO Health and Safety accreditation.
  - Any and all anomalies discovered must be raised at the company ISO Quality Audit committee meeting, and must be formally signed off by the Director.
- iii. Training
  - To ensure high levels of awareness of the potential for the existence of modern slavery and human trafficking we have introduced awareness training for all staff induction programmes and refresher training packages.

### **Key Performance Indicators and proven effectiveness of policies.**

We will use the following KPI's to measure company effectiveness in adhering to our published Modern Slavery and Human Trafficking policies. KPI's will be tested at audit and by the submission of period returns to the Quality Committee

- Ensure that proper documentation exists for all staff appointments
- Ensure that all staff have been sourced, interviewed, appointed and inducted in accordance with standing written instructions.
- Ensuring that all staff have received the necessary training, and are aware of their terms and conditions of employment, including the issue of a staff hand book with emphasis on their right to raise queries and questions in regard to treatment and management practice.