

Slavery and Human Trafficking Transparency Statement

TM Waste Ltd's turnover is below the £36 million threshold at which section 54(1) of the Modern Slavery Act 2015 requires publication of a statement. This document is nonetheless published voluntarily, in the same spirit, as our company's Slavery and Human Trafficking Transparency Statement. It reflects our ongoing policy and practice rather than a single financial year, and remains in effect until reviewed and superseded by the Board.

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 customers' 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 website and corporate literature.

ii. Internal procedures

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- We have a job description and personnel specification for all substantive jobs within the business, clearly setting out the requirements, attributes and training profile needed to discharge the duties.
- All job vacancies must be advertised and administered by trained HR staff.
- Interviews are 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 where 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.

Risk assessment and management

TM Waste Ltd recognises that the waste management sector relies on labour-intensive subcontracted and agency workforces, which the Home Office identifies as a higher-risk profile for modern slavery. We assess risk across our own operations and our supply chain on an ongoing basis, and prioritise mitigation accordingly:

- Higher-risk areas identified: use of agency and subcontracted labour, low-skilled and seasonal roles, and suppliers operating outside the UK/EU.
- Mitigating actions: supplier pre-qualification and ISO-based accreditation, contractual clauses requiring compliance with the Modern Slavery Act 2015, right-to-work verification for all direct and agency staff, and unannounced site visits by Internal Audit.
- Risk is reviewed at least annually by the Quality Committee, and following any material change to the business or its supply chain (e.g. a new subcontractor category, a new site).

Key Performance Indicators and proven effectiveness of policies

We will use the following KPIs to measure company effectiveness in adhering to our published Modern Slavery and Human Trafficking policies. KPIs will be tested at audit and by the submission of periodic 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.
- Ensure that all staff have received the necessary training, and are aware of their terms and conditions of employment, including the issue of a staff handbook with emphasis on their right to raise queries and questions in regard to treatment and management practice.

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- Ensure that the status of all suppliers is verified as being UK/EU based, with the necessary published policies in place.
- Number of whistle-blower notifications of untoward practice(s).
- Incidence of audit findings of untoward practice(s).

Further steps

Looking ahead, TM Waste Ltd intends to:

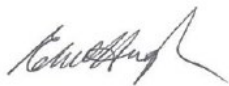
- Refresh modern slavery awareness training content for all staff and confirm completion rates at each induction and annual refresher cycle.
- Review supplier due diligence records to confirm all active suppliers hold a current Transparency Statement (or equivalent) on file.
- Report KPI outcomes and any audit or whistle-blower findings to the Quality Committee at each scheduled review.

Compliance

TM Waste Ltd expects senior management to demonstrate personal adherence to the company ethos underpinning the Modern Slavery Act 2015 Transparency Statement. Company Directors are responsible for monitoring compliance with all policies. The MD is personally responsible for ensuring all basic labour standards are met, while the HR and Health and Safety Directors are charged specifically with ensuring efforts are made to investigate and remediate all risks of modern slavery in the immediate business and feeder organisations.

Approval and review

This statement was approved by the Board of Directors, and is signed on its behalf by:



Director (TM Waste Ltd)

Date approved: 01/04/2026

This statement has no fixed expiry and remains current until superseded. The Board will review it periodically — at minimum every two years, and sooner if there is a material change to the business, its structure, or its supply chain.