

Modern Slavery Policy Statement

This policy is made pursuant to s.54 (1) of the Modern Slavery act 2015 and constitutes our slavery and human trafficking statement for the financial year ended December 2020

The policy sets out the steps that A Brunton LTD has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. A Brunton LTD has zero tolerance approach to any form of modern slavery, We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

A Brunton LTD is a commercial business operating in the recycling and waste management sector.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include

- Corporate social responsibility policy. This policy outlines how we will work in the best interests not only of our staff and stakeholders, but to the communities we work within, of society as a whole and of the environment
- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Equal opportunities policy. The purpose of this policy is to ensure equal opportunities for all workers, job applicants, clients and customers, irrespective of colour, race, nationality or ethnic origin, marriage or civil partnership, gender or gender reassignment, pregnancy and maternity, age, religion or belief, disability and sexual orientation. The policy also sets out the organisation's stance on valuing a diverse work force and customer base.

Our suppliers

A Brunton LTD operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery and on-site audits which include a review of working conditions.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For Internal Suppliers) They pay their employees any prevailing minimum wage applicable to their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified

Approval for this statement

This statement was approved by Adam Brunton on 20/01/2020

Name (Director) _____

Signature _____

Date _____