



**URM UK Ltd.**  
**Slavery and Human Trafficking Statement**

URM UK Ltd (“the Company”) is a glass collection and reprocessing company, turning glass waste into furnish ready cullet and glass aggregates.

As a large employer with over 200 staff, it is not just our responsibility to ensure that our own operational requirements are met, but also to prevent and deter any act of slavery and human trafficking, not only within our own business but also within the supply chain in which we operate.

Due to the number of staff we employ and the substantial geographical area in which we operate which ranges from the South East to the North of England, we recognise that we may be at risk of slavery, human trafficking, and ultimately other breaches of human rights within either our own operations or our supply chain.

The Modern Slavery Act 2015 (MSA 2015) places a legislative requirement on all businesses with sales of over 36 million to be transparent about their efforts to eradicate slavery and human trafficking, and this statement therefore explains the steps we have taken during the 2015/16 financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains or any part of our business.

To enable the Company to assess and appropriately react to our obligations under the MSA 2015 and to promote excellent working practices, we have established an MSA Project Group which involves membership of key staff who have a direct responsibility to promote and ensure compliance with the MSA 2015.

The Project Group has already established a strong foundation in existing employment policies which have been implemented and are currently available to all staff. These policies can also be accessed by third parties on request, simply by contacting our HR Team at Head Office.

The mentioned policies are reviewed annually by the Company’s legal advisors to ensure that they remain compliant with legislation and support the business needs. In particular, the Company’s Grievance and Whistleblowing Policies provide a clear procedure for raising any matters of concern in absolute confidence.

The Company also operates a strict Dignity at Work Policy which establishes an underlying obligation on all staff to treat others with respect and courtesy and to again, report any matters of concern in confidence.

The Project Group has also identified that onboarding processes can allow the Company an opportunity to strengthen existing recruitment practices which challenge any unusual

circumstances. For example, identifying a candidate applying for a role who may infer that the reason for wanting to work is due to another individual forcing them into employment.

Furthermore, any individual joining the Company who makes a request to have their earnings paid into another individual's bank account will only be allowed to move forward with this request when both a signature from the employee and the account holder is given on a Company form which confirms their full agreement with this arrangement.

There are members of staff within URM at present who have been identified as having such an agreement in place in relation to earnings, and the Company has requested consent by all parties to this arrangement.

The HR and Payroll lead within the Company has also received awareness training and is currently auditing all new starter paperwork/employee documentation to ensure any unusual situations are reported to the MSA Project Group as a priority. The Project Group can then review all facts and decide on the most appropriate action.

Ultimately, if the Company has concerns with internal or external measures taken by the Company, a customer or supplier in relation to slavery and human trafficking, the Company will address as a matter of urgency. This can ultimately result in the Company reserving its right to exclude any organisation from its supply chain or taking disciplinary action against any employee.

We are aware that this is very much a starting point in response to MSA 2015 and work will continue on this matter as we strive to continually develop current systems, processes and policies.

In particular, the MSA Project Group has already established the following key priorities moving forward into 2017;

- Introduce a continuous audit of all supplier and customer slavery and human trafficking statement's/associated policies to ensure that the Company is satisfied with responses and current working arrangements;
- The introduction of a Preventing Hidden Third Party Labour Exploitation and Human Rights policy to promote awareness on this subject internally.

This statement does provide clear confirmation that URM UK Ltd recognises the obligations under the MSA 2015 however, this statement will be updated annually to continually reflect our ongoing commitment in preventing any act of Slavery and Human Trafficking.



1<sup>st</sup> October 2019

Paul Hanks

Head of Health, Safety & Environment & Human Resources

URM (UK) Ltd