



## Policies & Procedures

# NWH Group Limited- Modern Slavery and Ethical Employment Policy

Reviewed – 09-01-2025

---

### 1. Introduction

NWH Group is committed to conducting business ethically and with integrity. We recognise the importance of ensuring that modern slavery and human trafficking do not occur within our operations or supply chains. As one of the UK's leading recycling and waste management businesses, we are dedicated to safeguarding the rights of all individuals involved in our operations.

This policy outlines the measures we take to prevent modern slavery and ensure ethical employment practices across all our sites, including how we work with agencies and external contractors.

### 2. Scope

This policy applies to all NWH Group employees, contractors, agency workers, and suppliers. It covers all aspects of our operations across Scotland and North East England and extends to our interactions with external partners and agencies.

### 3. Our Commitment to Preventing Modern Slavery

NWH Group is committed to:

**Ensuring Ethical Employment Practices:** We promote fair treatment, respect, and dignity for all employees, agency workers, and contractors. We do not tolerate any form of modern slavery, forced labour, or human trafficking within our operations or supply chains.

**Continuous Monitoring:** We regularly monitor the working hours of all individuals working with us, including agency workers, to identify and address any potential signs of exploitation.

**Right to Work Verification:** We require all agencies to provide documentation verifying the right to work in the UK for every individual they supply to us. This ensures compliance with legal requirements and helps prevent unlawful employment practices.

**Workplace Conditions:** Our site managers actively monitor working conditions, ensuring that all workers, including agency workers, have regular breaks, appropriate rest periods, and are treated with the same respect and care as our direct employees.

**Raising Awareness:** We have displayed posters at all our sites to raise awareness about modern slavery. These posters provide information on how to seek help if anyone suspects or is affected by modern slavery.

### 4. Working with Agencies and External Contractors

We recognise that agencies and external contractors play a vital role in our operations. Therefore, we have established the following guidelines to ensure compliance with our ethical standards:

**Agency Agreements:** All agencies and contractors we work with must agree to our terms and conditions, which include adherence to this Modern Slavery and Ethical Employment Policy.

Due Diligence: We conduct thorough due diligence on all agencies and contractors before engaging their services. This includes verifying their commitment to preventing modern slavery and ensuring ethical employment practices.

## **Policies & Procedures**

Regular Audits: We perform regular audits of our agencies and contractors to ensure they are complying with our standards. This includes reviewing their processes for verifying the right to work, monitoring working hours, and maintaining fair treatment of all workers.

Training and Education: We provide training to our site managers and other relevant personnel on how to identify signs of modern slavery and how to take appropriate action if any concerns arise.

Communication and Reporting: We encourage open communication between all workers, including agency staff, and our management team. If anyone suspects that modern slavery or unethical practices are occurring, they are encouraged to report their concerns immediately through our confidential reporting channels.

### **5. Reporting and Addressing Concerns**

NWH Group is committed to providing a safe and supportive environment for all workers. If any individual suspects or is aware of any form of modern slavery or unethical treatment, they should report it immediately to their line manager, site manager, or through our confidential whistleblowing hotline. All reports will be taken seriously, investigated thoroughly, and addressed promptly.

### **6. Continuous Improvement**

NWH Group is dedicated to continuously improving our practices to combat modern slavery and promote ethical employment. We regularly review and update this policy to reflect changes in legislation, best practices, and our own experiences.

### **7. Conclusion**

By adhering to this Modern Slavery and Ethical Employment Policy, NWH Group reaffirms our commitment to operating responsibly and ethically. We believe that by working together with our employees, agencies, and external contractors, we can help eradicate modern slavery and ensure that everyone involved in our operations is treated with fairness, respect, and dignity.

This policy reflects our values and commitment to ethical business practices. We expect all stakeholders to uphold these principles, ensuring that NWH Group continues to lead the way in promoting a responsible and ethical industry.

Signed:

Date: 09/01/2025

Gavin Money



Managing Director