

**Modern Slavery Procedure**

**1. Executive Summary**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as; slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. BSH Recycling have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

BSH Recycling are also committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, secondary workers, volunteers, agents, contractors, external consultants, third-party representatives or business partners.

This procedure does not form part of any employee’s contract of employment and it may need to be amended at any time.

**2. Responsibility for the Policy**

The Managing Director has overall responsibility for ensuring that this procedure complies with our legal and ethical obligations and that all those under our control comply with it.

The Managing Director has primary and day-to-day responsibility for implementing this procedure, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure that they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

**3. Compliance with the Policy**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. you are required to avoid any activity that may lead to, or suggest a breach in this policy.

You must notify your Manager or Managing Director as soon as possible fi you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your Manager/Managing Director or report it in accordance with the BSH Recycling Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally or the working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your Manager or Managing Director.

BSH Recycling aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be a mistake. BSH Recycling are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicions that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your Manager immediately.

#### 4. Communication and Awareness of Policy

Training on this policy and on the risk our business faces from modern slavery in its supply chain will be given where needed.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### 5. Breaches in Policy

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

BSH Recycling may terminate our relationship with other individuals or organisations working on our behalf if they breach this policy.

#### 6. Signed



**Chris Seggie**  
**Managing Director**  
**February 2025**